MARYLAND DEPARTMENT OF TRANSPORTATION (MDOT)

RAIL SAFETY OVERSIGHT

PROGRAM STANDARD

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Maryland Department of Transportation
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Table of Contents

1 INTRODUCTION AND OVERVIEW 4

1.1 PURPOSE 4
1.2 AUTHORITY 4
1.3 MDOT STATE SAFETY OVERSIGHT PROGRAM 4
1.4 QUARTERLY MDOT-MTA MEETINGS 8
1.5 FTA REGIONAL OFFICE QUARTERLY MTA MEETING 9
1.6 AFFECTED RAIL TRANSIT AGENCY(S) 9
1.7 CONFLICT OF INTEREST 10
1.8 REVISIONS AND UPDATES 10
1.9 DEFINITIONS AND ACRONYMS 10

2 SYSTEM SAFETY PROGRAM PLAN STANDARD 13

2.1 OBJECTIVE 13
2.2 SSPP MINIMUM REQUIREMENTS 13
2.3 SUBSEQUENT REVIEWS OF MTA SSPP 16
2.4 SSPP SUBMITTALS FROM NEW STARTS PROJECTS 18

3 SECURITY AND EMERGENCY PREPAREDNESS PLAN STANDARD 19

3.1 OBJECTIVE 19
3.2 SEPP MINIMUM REQUIREMENTS 19
3.3 ANNUAL REVIEW OF MTA SEPP 21
3.4 SEPP SUBMITTALS FROM NEW STARTS PROJECTS 23
3.5 SEPP READINESS REVIEW 23

4 INTERNAL SAFETY AND SECURITY REVIEW PROGRAM 24

4.1 OBJECTIVES 24
4.2 MINIMUM REQUIREMENTS FOR REVIEWS 24
4.3 MINIMUM REQUIREMENTS FOR ANNUAL INTERNAL SAFETY AND SECURITY REVIEW REPORT 25

5 HAZARD MANAGEMENT PROCESS 27

5.1 OBJECTIVE 27
5.2 APPLICATION CRITERIA AND MINIMUM REQUIREMENTS 27
5.3 HAZARD TRACKING LOG 28
5.4 PRIORITIZATION OF HAZARDS ..... **ERROR! BOOKMARK NOT DEFINED.**
5.5 NOTIFICATION OF HAZARDS ..... **ERROR! BOOKMARK NOT DEFINED.**
5.6 INVESTIGATION OF HAZARDS 31

6 ACCIDENT NOTIFICATION, INVESTIGATION AND REPORTING 27

6.1 OBJECTIVE 33
6.2 MINIMUM REQUIREMENTS 33
6.3 INVESTIGATIONS OF REPORTABLE EVENTS 34
6.4 INDEPENDENT MDOT INVESTIGATIONS 36

7 TRIENNIAL ON-SITE SAFETY AND SECURITY REVIEW 39

7.1 OBJECTIVE 39
7.2 MINIMUM REQUIREMENTS 39
7.3 PROCESS AND PROCEDURE 41

8 CORRECTIVE ACTION PLANS 45

8.1 OBJECTIVES 45

8.2 MINIMUM REQUIREMENTS 45
8.3 NOTIFICATION 46
8.4 CORRECTIVE ACTION PLAN REVIEW AND APPROVAL 46
8.5 MONITORING AND TRACKING 46

9 REPORTING TO FTA 49

9.1 OBJECTIVE 49
9.2 REPORTING REQUIREMENTS TO FTA 49

10 OTHER MDOT REVIEWS 51

10.1 SSPP READINESS REVIEW ..... **ERROR! BOOKMARK NOT DEFINED.**
10.2 REVIEWS OF SAFETY AND SECURITY CERTIFICATION PROGRAM 51
10.3 REVIEWS OF SYSTEM EXPANSIONS AND SYSTEM MODIFICATIONS 51

APPENDIX A – CHECKLIST FOR REVIEWING THE SSPP 54

APPENDIX B – CHECKLIST FOR REVIEWING THE SEPP 63

APPENDIX C – MTA ACCIDENT/INCIDENT INVESTIGATION PROCEDURES (AIIP) 68

APPENDIX D –MDOT ANNUAL APPROVAL OF MTA INTERNAL SAFETY AND SECURITY REVIEW REPORT CHECKLIST 69

1 Introduction and Overview

1.1 Purpose

This document describes the state of Maryland's program for addressing regulations promulgated by the Federal Transit Administration (FTA). These regulations establish minimum requirements for safety and security programs at the one Rail Transit Agency (RTA) currently within the state's jurisdiction, the Maryland Transit Administration (MTA). The purpose of this document is to provide standards, procedures, and technical direction to MTA in order to implement the program specified by the state.

1.2 Current Authority

The State of Maryland has assigned the Maryland Department of Transportation (MDOT) as the Rail Safety Oversight Agency, the agency responsible for rail transit safety and security oversight in the state. This document establishes the system safety and security requirements for the MTA to implement the provisions of the Rail Safety Oversight Program.

FTA's authority to require this program derives from its authority to condition the receipt of FTA grant funds on compliance with FTA guidance (49 U.S.C. § 4324(c)). The Intermodal Surface Transportation Efficiency Act (ISTEA), reauthorized by the Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFTEA-LU), directed FTA to issue regulations requiring states to oversee the safety and security of rail transit agencies (49 USC § 5330). FTA promulgated its regulations through the adoption of a rule in 1995, entitled "Rail Fixed Guideway Systems; State Safety Oversight" (49 CFR Part 659). FTA recently revised 49 CFR Part 659, publishing its new final rule on April 29, 2005, hereinafter referred to as "the rule" or Part 659.
The RSOPS documents both MTA and MDOT required activities to implement *Part 659*. It also specifies the program in place to ensure ongoing communication between MDOT and MTA regarding safety and security information, and to address MDOT communication with the FTA, including initial, annual, and periodic submissions.

In October 2012, the Moving Ahead for Progress in the 21st Century Act (hereafter "MAP-21"), which includes new provisions for State Safety Oversight agencies, including MDOT, became effective. MDOT has begun working to implement the provisions of MAP-21, which will strengthen the oversight program by ensuring the legal and financial independence of the oversight agency, providing specific authority to enforce program requirements and to compel action by the covered transit agencies, and to conduct audits, inspections, and field measurements, among other new requirements. As of this version of the RSOPS, and as MDOT transitions into full implementation of the provisions of MAP-21, all of the requirements of Part 659 will remain fully effective and enforceable. Part 659 will remain effective until three years after the FTA promulgates the pending final rulemaking for MAP-21.

1.3 MDOT State Safety Oversight Program

The MDOT Assistant Secretary of Transportation, Office of Administration has been designated by the MDOT Secretary to appoint the MDOT Program Director and ensure that the Rail Safety Oversight Program is implemented. The MDOT State Safety Oversight Program is directed by

the Program Director, MDOT Office of Homeland Security, Emergency Management and Rail Safety.

Oversight Agency:	Maryland Department of Transportation (MDOT)
Program Director:	(Vacant)
Oversight Program Manager:	Mr. Larry White Program Manager, Rail Safety Oversight Maryland Department of Transportation 7201 Corporate Center Drive Post Office Box 548 Hanover, Maryland 21076 Phone: 410-865-1010 Fax: 410-865-1113 Cell: 410-662-2050 lwhite9@mdot.state.md.us

MDOT is authorized to arrange a meeting with the MTA Administrator in the event that agency-wide attention should be focused on a specific MTA safety or security issue. MDOT retains the authority to use contractors as required to support the performance of safety and security oversight activities.

1.3.1 Roles and Responsibilities

The Secretary or his or her designee is responsible for:

- Appointing an MDOT Program Director, [659.9]
- Ensuring that the Rail Safety Oversight Program (RSOP) is implemented,
- Informing all levels of direct report management of their responsibilities within the program, and providing suitable authority to carry-out these responsibilities,
- Providing necessary resources to meet the requirements of the Oversight Program.

The Administrator of the Maryland Transit Administration is responsible for:

- Complying with the mandate of the RSOP Standard and ensuring compliance within the MTA, [659.27 (g) Chief Executive Compliance Certification]
- Establishing and maintaining an SSPP which complies with 49 CFR 659 and this Standard, [659.17]
- New construction work, or modifications to the system, officially informing MDOT in a timely manner on all witness, inspections, sampling inspections, and certification points, and provide such access as is necessary to meet this requirement, [659.19 (h)]
- Establishing and maintaining an SEPP which complies with 49CFR 659 and this Standard, [659.21]
- Ensuring that an Annual Review of the SSPP/SEPP is conducted, and submitting any change to MDOT for approval, [659.25]

- Ensuring that a suitable Internal Safety and Security Review Process is developed and implemented, [659.27]
- Ensuring that MDOT is notified no later than December 31st, of the Annual Schedule of Internal Safety and Security Reviews for the coming year, [659.27 (c)]
- Ensuring that checklists used for the Internal Safety and Security Review Process are submitted to MDOT for approval, [659.27 (d), (e)]
- Submitting an Annual Report documenting Internal Safety and Security Review activities and the status of findings and corrections actions, [659.27 (f)]
- Along with the Internal Safety and Security Review Annual Report, submitting a formal Letter of Certification indicating that the MTA is in compliance with its SSPP and SEPP, [659.27 (g)]
- Ensuring that a Hazard Management Process approved by MDOT is developed and implemented and that MDOT is notified in the event of an Hazardous Condition, [659.31]
- Ensuring that MDOT is notified in the event of a Reportable Incident, [659.33]
- Ensuring that Incident Investigations are conducted using a procedure authorized by MDOT, [659.35 (c)]
- Complying with MDOT Corrective Actions Plan (CAP) Program, and ensuring that Corrective Action Plans are submitted for approval by MDOT. [659.37]

The Director, Rail Safety Oversight Program is responsible for:

- Ensuring that the RSOP Standard is established, reviewed biennially and updated as necessary in an ongoing manner,
- Ensuring that Office resources are available to support the Program,
- Approving the RSOP Standard,
- Approving the MTA SSPP, and issuing of a formal Letter of Approval, [659.17 (c)]
- Approving the MTA SEPP, and issuing a formal Letter of Approval, [659.21 (c)]
- Submitting the MDOT Standard changes and Annual Report to the FTA, [659.15 (a)]
- Directing the MTA to develop and implement an SSPP that complies with this Standard and 49CFR 659, [659.17(a)]
- Directing the MTA to develop and implement an SEPP that complies with this Standard and 49CFR 659, [659.21(a)]
- Directing the MTA to conduct annual review of its SSPP and SEPP, [659.25 (a)]
- Directing the MTA to conduct an Internal Safety and Security Review Program, [659.27 (a)]
- Directing the MTA to submit an Annual Report summarizing and documenting the results of the Internal Safety and Security Review Program, [659.27 (f)]
- Formally approving the MTA Internal Safety and Security Review Process annually, [659.27(i)]
- Reviewing triennially, the MTA's implementation of its SSPP and SEPP and submitting a Triennial Review to the FTA, [659.29]
- Directing the MTA to develop and implement a Hazard Management Process in accordance with this Standard and 49CFR 659, [659.31(a)]
- Directing the MTA to develop and implement an Incident Notification Process in accordance with this Standard and 49CFR 659, [659.33 (a), (b), (c)]

- Formally adopting any incident investigation conducted by the MTA or any third party on MDOT's behalf, [659.35 (e)]
- Approving CAPs proposed by the MTA, [659.37 (c)]
- Submitting any changes in the RSOP Standard to the FTA, [659.39]
- Submitting the Annual Oversight Activities Report and the Certification of Compliance to the FTA, no later than 15 March of each year, [659.39 (c)]
- Prohibiting a party or entity from providing services to both the oversight agency and the rail transit agency where there exists a conflict of interest, [659.41]
- Annually certifying to the FTA, MDOT compliance with Rule 49CFR 659. [659.43]

The Program Manager, Rail Safety Oversight Program is responsible for:

- Managing the RSOP,
- Establishing, developing, publishing, maintaining the RSOP Standard and Procedures, [659.13, 659.15 (a), (b)]
- Reviewing biennially, the RSOP Standard, revising it as required, and submitting it for approval, [659.15 (a)]
- Reviewing annually the MTA SSPP, and recommending it for approval, [659.17 (b)]
- Specifying the requirements of the MTA SSPP, [659.19]
- Reviewing annually the MTA SEPP, and recommending it for approval, [659.21(c)]
- Specifying the requirements of the MTA SEPP, [659.23]
- Reviewing and recommending approval of any changes to the MTA SSPP and SEPP, [659.25 (b)]
- Reviewing annually the findings and recommendations of the MTA Internal Safety and Security Review Process and recommending for approval, [659.27(i)]
- Reviewing at least triennially, the MTA's implementation of its SSPP and SEPP and submitting a Triennial Review for approval, [659.29]
- Review and recommend for approval the SEPP Hazard Management Process, [659.31(b)]
- Specifying how the MTA will notify MDOT in the event of a Reportable Hazardous Condition, [659.31 (5)]
- Specifying how the MTA will notify MDOT on the resolution status of a Reportable Hazardous Condition, [659.31 (6)]
- Specifying how the MTA will investigate Reportable Incidents that occur as a result of MTA activity, [659.35 (a)]
- Establishing and implementing the RSOP Standard Incident Investigation Procedure, [659.35 (b)]
- Specifying the Incident Notification Process to be established by the MTA, [659.35 (b)]
- Requiring that the MTA provides MDOT status on investigations as requested, [659.35 (f)]
- Establishing and implementing the RSOP Standard Corrective Actions Plan Procedure, [659.37]
- Requiring that the MTA develop Corrective Action Plans (CAPs) in accordance with this Standard and 49CFR 659, [659.37 (a), (b), (d), (e)]
- Reviewing and recommending for approval any CAPs proposed by the MTA, [659.37 (c)] and
- Tracking the implementation of each approved CAP. [659.37 (g)]

The Chief of Police, Maryland Transit Administration is responsible for:

- Developing and implementing the SEPP in accordance with this Standard and 49CFR 659, [659.21 (a), 659.23] and
- Conducting an annual review of the SEPP and submitting any changes to MDOT for approval. [659.25]

The Chief Safety Officer, Safety, Quality Assurance and Risk Management, MTA, is responsible for:

- Developing and implementing the SSPP in accordance with the RSOP Standard and 49CFR 659, [659.17 (a)]
- Facilitating an annual review of the SSPP and submitting any changes to MDOT for approval, [659.25]
- Managing the Annual Internal Safety and Security Review process, [659.27]
- Managing the MTA Hazard Management Process, [659.31]
- Notifying, in accordance with this Standard 49CFR 659, and MTA Hazard Management Program, MDOT in the event of a hazardous condition, [659.31]
- Notifying, in accordance with this Standard and 49CFR 659, MDOT in the event of a reportable incident, [659.33]
- Assisting line management in conducting Incident Investigations, [659.35 (c)]
- Ensuring Incident Investigations are conducted in association with line management consultants and other staff, and
- Overseeing the MTA CAP Program. [659.37]
- Ensuring and formally documenting that all Safety-related CAPs submitted to MDOT have been reviewed by appropriate MTA Safety, Operating, and/or Engineering personnel
- Verifying to the MDOT Program Director through formal written notification when an approved Safety-related CAP has been completed

1.4 Quarterly MDOT-MTA Meetings

To ensure ongoing involvement with the MTA, MDOT is requiring quarterly meetings with the MTA to review MTA safety and security activities such as open accidents and incidents, open CAPs, the hazard management process, and status of the on-site triennial review. By the first week after each calendar year quarter has ended, MDOT will submit to the MTA a proposed date and location for the quarterly meeting and a proposed agenda. The MTA will review and if required comment on the agenda, making recommendations for any modifications as appropriate. MDOT will schedule the quarterly meeting with the MTA.

During the quarterly meetings, MDOT retains the authority to request and review any safety and/or security records maintained by the MTA. If these records are not available at the meetings, they will be transmitted to MDOT in electronic copy via email or in hard copy via mail or fax after the conclusion of the quarterly meeting.

MDOT should prepare meeting minutes from each quarterly meeting, being sure to document any identified action items or required activities. The meeting minutes should be prepared and submitted to the MTA as soon as possible after each quarterly meeting.

1.5 FTA Regional Office Quarterly MTA Meeting

The FTA Regional Office holds quarterly meetings with grantee transit agencies, including MTA. FTA has requested that MDOT participate in these meetings. MDOT will provide a briefing on State Safety and Security Oversight Program issues, including open corrective action plans, accident/incident investigations, hazardous conditions, and other concerns, such as:

- The status of updates to the MDOT RSOPS (this document)
- The MTA SSPP and SEPP
- Open findings from FTA audits
- The MDOT Triennial Safety and Security Review
- Special studies and hazard assessments by MDOT-RSOP
- Oversight of capital project safety and security certification efforts

MDOT will work with MTA to ensure that FTA is provided with all requested information.

1.6 Affected Rail Transit Agency(s)

RTAs affected by this program include any light, heavy, or rapid rail system, monorail, inclined plane, funicular, trolley, or automated guideway operating within the state's jurisdiction that:

- is not regulated by the Federal Railroad Administration; and
- is included in FTA's calculation of fixed guideway route miles or receives funding under FTA's formula program for urbanized areas (49 U.S.C. 5336); or
- has submitted documentation to FTA indicating its intent to be included in FTA's calculation of fixed guideway route miles to receive funding under FTA's formula program for urbanized areas (49 U.S.C. 5336).

RTA's subject to the provisions of the state's program at the time of this revision include:

Name and address of RTA	**Name and address of RTA Point-of-contact**
Maryland Transit Administration (MTA)	**Safety:** Yvette Muhammad YMuhammad@mta.maryland.gov **Security:** Lt. Ernest Fenner efenner@mta.maryland.gov

Affected RTAs shall supply, and update as necessary, the above information for their safety and security programs to MDOT. At present, the only RTA under MDOT's Rail Safety Oversight Program is the MTA. Should other RTAs develop within the State of Maryland, MDOT will review and revise its Program Standard appropriately.

1.7 Conflict of Interest

No individual or entity may provide services to both MDOT and MTA when there is a conflict of interest or an appearance of a conflict. A conflict of interest occurs when an individual or entity performing work for MTA or MDOT is unable, or potentially unable, to render impartial assistance or advice on the development or implementation of the standards and provisions of this SSO manual, or to objectively perform such work without bias. A third party contractor to MDOT or MTA may not have an unfair competitive advantage over other contractors. Each contractor is subject to full disclosure on all present and potential conflicts of interest in its activities or relationships prior to being awarded a contract with MDOT or MTA.

1.8 Revisions and Updates

Reviewing and updating the Rail Safety Oversight Program Standard is an ongoing and constant process. To ensure currency, this document will be formally reviewed on a biennial schedule to determine if updates are necessary. The next biennial review will begin in March, 2014, at a date and time to be determined between MDOT and the MTA Executive Director of Safety, Quality Assurance and Risk Management. After a 30-day review period, during which MDOT will develop its proposed revisions, the revised document will be circulated for review in draft form to the MTA. At least 30 days will be provided for the MTA to submit comments to MDOT. Following this review and comment period, draft changes will be approved by the Director of the Maryland SSO Program and incorporated into the next version of the document. After every update, final versions of the revised document will be submitted to the MTA's safety and security points-of-contact, as indicated in Section 1.5. Final versions of the revised document will also be submitted to FTA's Office of Safety and Security as part of MDOT's Annual Submission.

In addition to the biennial update, changes may be requested to this document based on reviews or audits from internal or external sources, such as FTA, or based on policy changes, statewide meetings, and/or organizational changes. MDOT personnel will review and respond to each request in a timely manner. Proposed changes to this document will be circulated for review in draft form to MTA. As with the biennial updates, final copies of the revised version of this document will be submitted to the MTA's safety and security points-of-contact and to the FTA as part of MDOT's Annual Submission.

1.9 Definitions and Acronyms

Definitions used in this document include the following:

Contractor means an entity that performs tasks required on behalf of the oversight or rail transit agency. The rail transit agency may not be a contractor for the oversight agency.

Corrective Action Plan (CAP) means a plan developed by the rail transit agency that describes the actions the rail transit agency will take to minimize, control, correct, or eliminate hazards or deficiencies. All Corrective Action Plans must include a schedule for implementing those actions, and formal indication of the individual(s) and department(s) responsible for implementation of those actions. Corrective Action Plans may be derived from the following sources:

- the results of accident and incident investigations
- internal and external safety and security audits/reviews performed by MTA or MDOT

- the hazard management process

FRA means the Federal Railroad Administration, an agency within the U.S. Department of Transportation.

FTA means the Federal Transit Administration, an agency within the U.S. Department of Transportation.

Hazard means any real or potential condition (as defined in the rail transit agency's hazard management process) that can cause injury, illness, or death; damage to or loss of a system, equipment or property; or damage to the environment.

Individual means a passenger; employee; contractor; other rail transit facility worker; pedestrian; trespasser; or any person on rail transit-controlled property.

Investigation means the process used to determine the causal and contributing factors of an accident or hazard, so that actions can be identified to prevent recurrence.

New Starts Project means any rail fixed guideway system funded under FTA's 49 U.S.C. 5309 discretionary construction program.

Oversight Agency means the entity, other than the rail transit agency, designated by the state or several states to implement this part.

Passenger means a person who is on board, boarding, or alighting from a rail transit vehicle for the purpose of travel.

Passenger Operations means the period of time when any aspect of rail transit agency operations are initiated with the intent to carry passengers.

Program Standard means a written document developed and adopted by the oversight agency, that describes the policies, objectives, responsibilities, and procedures used to provide rail transit agency safety and security oversight.

Rail Fixed Guideway System means any light, heavy, or rapid rail system, monorail, inclined plane, funicular, trolley, or automated guideway that: (1) is not regulated by the Federal Railroad Administration; and (2) is included in FTA's calculation of fixed guideway route miles or receives funding under FTA's formula program for urbanized areas (49 U.S.C. 5336); or (3) has submitted documentation to FTA indicating its intent to be included in FTA's calculation of fixed guideway route miles to receive funding under FTA's formula program for urbanized areas (49 U.S.C. 5336).

Rail Transit Agency (RTA) means an entity that operates a rail fixed guideway system.

Rail Transit-Controlled Property means property that is used by the rail transit agency and may be owned, leased, or maintained by the rail transit agency.

Rail Transit Vehicle means the rail transit agency's rolling stock, including but not limited to passenger and maintenance vehicles.

Safety means freedom from harm resulting from unintentional acts or circumstances.

Security means freedom from harm resulting from intentional acts or circumstances.

State means a state of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

System Safety Program Plan (SSPP) means a document developed and adopted by the rail transit agency, describing its safety policies, objectives, responsibilities, and procedures.

Security and Emergency Preparedness Plan (SEPP) means a document developed and adopted by the rail transit agency describing its security policies, objectives, responsibilities, and procedures.

2 System Safety Program Plan Standard

2.1 Objective

This section identifies the minimum requirements for the System Safety Program Plan (SSPP) to be developed, approved, adopted and implemented by MTA.

2.2 SSPP Minimum Requirements

MDOT has adopted the minimum requirements for RTA SSPPs from 49 CFR 659.17 and 49 CFR 659.19 of the revised Rule. MDOT encourages MTA to exceed this standard in their revenue service operations and to further enhance safety by applying system safety principles throughout all life cycle phases of the transit system's activities.

MTA must develop, implement, and maintain a written SSPP that complies with the program requirements outlined in Figure 1 on the following pages, and detailed in the SSPP Review Checklist located in Appendix A of this document. These requirements are based on Appendix E of the *FTA Resource Toolkit for State Oversight Agencies Implementing 49 CFR Part 659*, issued January 2006.

At a minimum, the SSPP developed by the MTA must:

- be endorsed by top management of the transit agency;
- establish the safety goals and objectives of the transit agency;
- identify the safety roles and responsibilities of all MTA departments/functions;
- require cooperation within the transit agency and the accountability of executive leadership for addressing identified safety issues;
- identify the hazard management process to be managed by the MTA;
- identify the internal safety review process to be managed by the MTA and overseen by MDOT;
- identify the notification, investigation and reporting procedures to be used jointly by the MTA and MDOT in managing accidents meeting thresholds specified by FTA's rule;
- require communication and coordination with MDOT in all SSO program provisions; and
- provide a schedule for the implementation and revision of the SSPP.

Figure 1: SSPP Requirements – 21 Elements

1. Executive Approval (Policy Statement)

2. Purpose, Goals and Objectives
   - 2.1 Purpose
   - 2.2 Goals
   - 2.3 Objectives

3. Management Structure
   - 3.1 Overview
     - 3.1.1 General Overview and History of Transit Agency
     - 3.1.2 Scope of Transit Services
     - 3.1.3 Physical Plant
     - 3.1.4 Operations
     - 3.1.5 Maintenance
   - 3.2 Integration of Safety Function
   - 3.3 Lines of Authority for Safety

4. Plan Review and Modification
   - 4.1 SSPP Review Schedule
   - 4.2 SSPP Control and Update Procedures
   - 4.3 SSPP Review and Approval by the State Oversight Agency
   - 4.4 SSPP Change Management

5. SSPP Implementation – Tasks and Activities
   - 5.1 Overview
   - 5.2 System Safety Function
     - 5.2.1 Methodology Used by the System Safety Unit
   - 5.3 Safety Responsibilities of Other Departments
   - 5.4 Safety Task Responsibility Matrix (or Narrative Description)

6. Hazard Management Process
   - 6.1 Overview
   - 6.2 Hazard Management Process – Activities and Methodologies
   - 6.3 Coordinating with the State Oversight Agency

7. Safety Certification

8. Managing Safety in System Modifications

9. Safety Data Acquisition
   - 9.1 Data Acquisition Process
   - 9.2 Access to Data

10. Accident/Incident Notification, Investigation and Reporting
    - 10.1 Overview
    - 10.2 Accident/Incident Reporting Criteria
    - 10.3 Accident/Incident Investigation Procedures
    - 10.4 Internal Notification Procedure
    - 10.5 External Notification Procedure
    - 10.6 Accident/Incident Reporting and Documentation
    - 10.7 Corrective Action Resulting from Accident Investigation
    - 10.8 Coordination with State Oversight Agency

11. Emergency Response Planning/Coordination/Training

- 11.1 Accident Response
- 11.2 Evacuation Procedures
- 11.3 Responsibilities for Emergency Preparedness
- 11.4 Coordinated Schedule
- 11.5 Emergency Drills and Exercises
- 11.6 Emergency Procedures
- 11.7 Emergency Training
- 11.8 Familiarization Training

12. Internal Safety Review Process
    - 12.1 Overview
    - 12.2 Scope of Activities
    - 12.3 Review Process
        - 12.3.1 Integrity of Review Process
        - 12.3.2 Cycle/Schedule
        - 12.3.3 Checklists and Procedures
        - 12.3.4 Annual Review Report
        - 12.3.5 Review Reporting
        - 12.3.6 Coordination with the Oversight Agency
        - 12.3.7 Review Completeness

13. Rules Compliance/Procedures Review
    - 13.1 Overview
    - 13.2 Review of Rules and Procedures
    - 13.3 Process for Ensuring Rules Compliance
    - 13.4 Compliance Techniques – Operations and Maintenance Personnel
    - 13.5 Compliance Techniques – Supervisory Personnel
        - 13.6 Documentation

14. Facilities and Equipment Inspections
    - 14.1 Facilities and Equipment Subject to Inspection
    - 14.2 Regular Inspection and Testing
    - 14.3 Checklists
    - 14.4 Coordination with Hazard Management Process

15. Maintenance Reviews/Inspections
    - 15.1 Systems and Facilities Subject to Maintenance Program
    - 15.2 Resolution of Review/Inspection Findings
    - 15.3 Checklists

16. Training and Certification Review/Review
    - 16.1 Overview
    - 16.2 Employee Safety Program
    - 16.3 Safe Number of Working Hours for Safety-Sensitive Positions
    - 16.4 Contractor Safety
    - 16.5 Record Keeping
    - 16.6 Compliance with Training Requirements

17. Configuration Management
    - 17.1 Overview
    - 17.2 Process for Changes
    - 17.3 Authority for Change

18. Compliance with Local, State and Federal Requirements
    - 18.1 Employee Safety Program
    - 18.2 Working on or near Rail Transit Controlled Property

18.3 Compliance with Required Safety Programs
18.4 Compliance with the Contractor Safety Program

19. Hazardous Materials

20. Drug & Alcohol Abuse

21. Procurement

2.3 Subsequent Reviews of MTA SSPP

MTA shall conduct an annual review of its SSPP and update it as necessary to ensure that the SSPP is current at all times. The MTA shall complete the review for the previous calendar year and submit a revised SSPP to MDOT by March 1. As appropriate, referenced materials affected by the revision(s) should also be submitted with the SSPP.

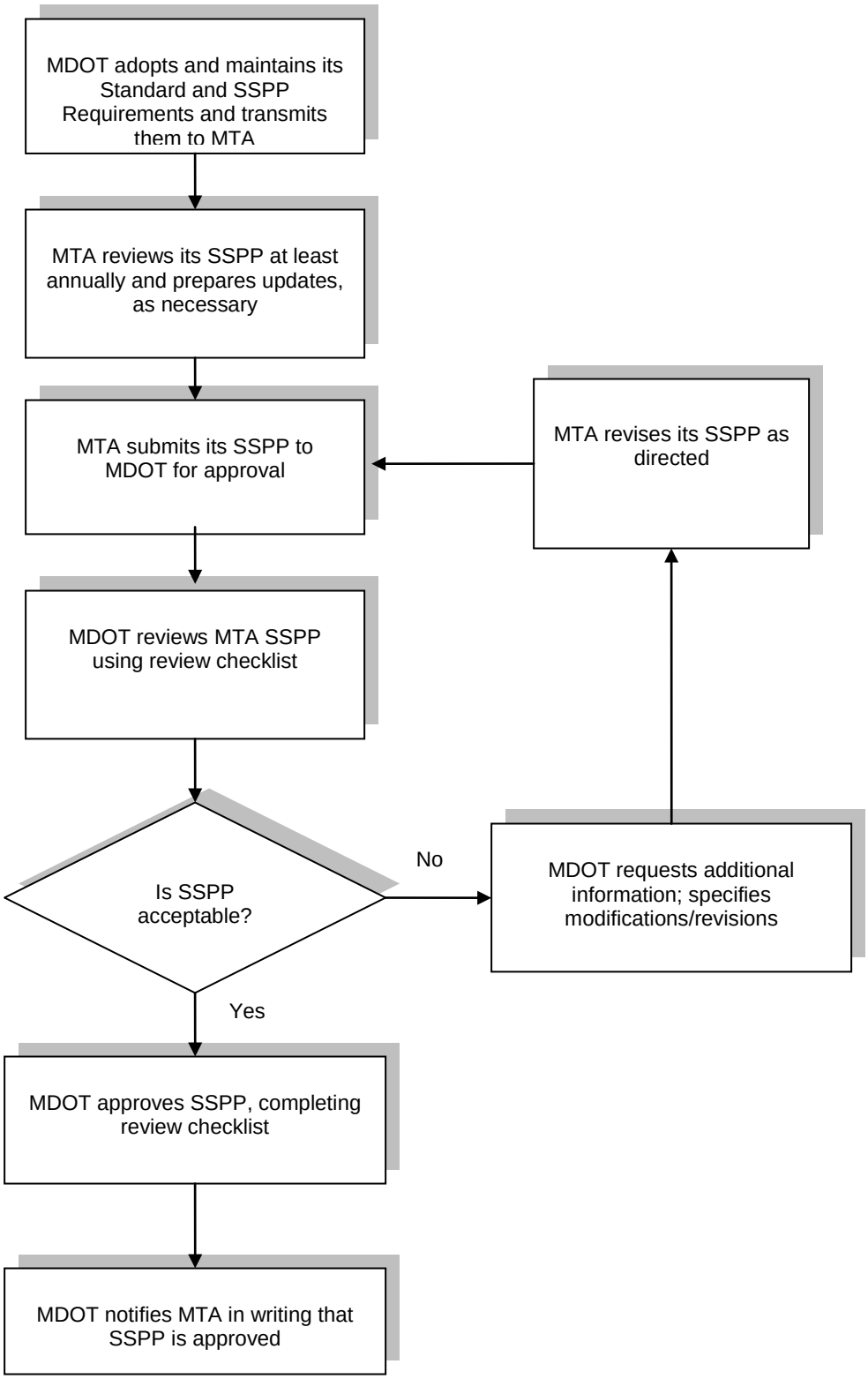
Each revised SSPP submitted to MDOT by MTA shall include a text or tabular summary that identifies and explains proposed changes and includes a time frame for completion of the associated activities. Following the process specified in Figure 2, MDOT will review subsequent SSPP submissions from MTA according to the SSPP Checklist contained in Appendix A. Upon approval of modifications, MDOT will issue to the MTA written approval of its SSPP within 30 calendar days of submission and the completed SSPP checklist.

In the event that MTA conducts its annual SSPP review and determines that no update is necessary for that year, it must prepare and submit by March 1 formal correspondence notifying MDOT of this determination. If MDOT wishes to object to this determination, MDOT will notify MTA within 30 days.

Additional reviews of the MTA SSPP may be required to address specific issues based on revisions to MDOT's program standard or procedures, revisions to FTA 49 CFR 659, review results, on-site reviews, investigations, or changing trends in incident data. Upon receipt of a written notification from MDOT for SSPP modifications, the MTA shall submit a revised SSPP to MDOT within 30 calendar days. MDOT will review and approve the revised SSPP, providing a formal approval letter and a completed review checklist (if appropriate for the change) within 30 days of receipt of the revised MTA SSPP.

In the event that the MTA initiates updates outside of the annual review cycle, the MTA shall submit the modified SSPP, and any subsequently modified procedures, to MDOT for review and approval within 30 calendar days of the effective date of the change.

Figure 2: SSPP Approval Process



2.4 SSPP Submittals from New Starts Projects

At present, the only Rail Transit Agency in the State of Maryland covered by MDOT's Rail Safety Oversight Program is the Maryland Transit Administration. Should a transit agency begin the process of offering rail service, MDOT will revisit its Program Standard at the outset of the New Starts process. Furthermore, any major capital expansion or service extension (consistent with the FTA definition) at the MTA will be considered a "new start."

An RTA New Starts project shall make an initial submittal of an SSPP and all referenced procedures/materials to MDOT at least 180 calendar days before beginning passenger service operations. The initial SSPP will be approved and adopted by the RTA as part of the New Starts project safety certification process.

MDOT will review and approve the initial SSPP using its review checklist in Appendix A, and will transmit a formal letter of approval and the completed checklist to the RTA point-of-contact. While conducting its review, MDOT may request additional information, clarifications or revisions from the RTA safety point-of-contact. A meeting or teleconference may also be conducted to address any issues identified by MDOT during its review of the SSPP. Any additional requirements will be conveyed by MDOT.

3 Security and Emergency Preparedness Plan Standard

3.1 Objective

This section identifies the minimum requirements for the Security and Emergency Preparedness Plan (SEPP) to be developed, approved, adopted and implemented by MTA.

3.2 SEPP Minimum Requirements

The MTA must develop, implement, and maintain a written SEPP that complies with the program requirements outlined in Figure 3 on the following page, and detailed in the SEPP Review Checklist located in Appendix B of this document. These minimum requirements are based on Appendix G of the *FTA Resource Toolkit for State Oversight Agencies Implementing 49 CFR Part 659*, issued January 2006. The FTA guidance addresses all of the activities specified in 49 CFR Part 659.21 and 49 CFR Part 659.23. In addition, compliance with the FTA guidance is required for RTAs participating in the Department of Homeland Security (DHS), Office of Grants and Training. The program requirements also affirm the authority of the Transportation Security Administration (TSA) in the areas of rail transit security and terrorism preparedness.

At a minimum, the SEPP developed by the MTA must:

- identify the policies, goals, and objectives for the security program endorsed by the chief executive of MTA;
- document the MTA process for managing threats and vulnerabilities during operations and for major projects, extensions, new vehicles and equipment, including integration with the safety certification process;
- identify controls in place that address the personal security of passengers and employees;
- specify the mechanism through which the MTA will ensure the reporting of security incidents meeting the thresholds outlined in Section 6.2.1 of this document, such as a general order or SOP;
- document the MTA process for conducting internal security reviews to evaluate compliance and measure the effectiveness of the Security and Emergency Preparedness Plan; and
- document the MTA process for making available its Security and Emergency Preparedness Plan and accompanying procedures to MDOT for review and approval.

In addressing this last item, MDOT has authority in place to protect against the public disclosure of MTA security documents. To ensure the further protection of these documents, MDOT requests that all security submissions are either delivered to MDOT in person, via email, or delivered via overnight mail with a signature required.

Figure 3: SEPP Requirements – 7 Elements

1.0 System Security Program Introduction
- 1.1. Purpose of the SEPP
  - 1.1.1 System Security
  - 1.1.2 Emergency Preparedness
- 1.2 Goals and Objectives
  - 1.2.1 Goals
  - 1.2.2 Objectives
- 1.3 Scope of Program
- 1.4 Security and Law Enforcement
- 1.5 Management Authority and Legal Aspects
- 1.6 Government Involvement
- 1.7 Security Acronyms and Definitions

2.0 System Description
- 2.1 Background & History of System
- 2.2 Organizational Structure
- 2.3 Human Resources
- 2.4 Passengers
- 2.5 Services and Operations
- 2.6 Operating Environment
- 2.7 Integration with Other Plans and Programs
- 2.8 Current Security Conditions
- 2.9 Capabilities and Practices

3.0 SEPP Management Activities
- 3.1 Responsibility for Mission Statement and System Security Policy
- 3.2 Management of the SEPP Program
- 3.3 Division of Security Responsibilities
- 3.3.1 Security/Police Function Responsibilities
- 3.3.2 Security Responsibilities of Other Departments/Functions
- 3.3.4 Job-specific Security Responsibilities
- 3.3.5 Security Task Responsibilities Matrix
- 3.3.7 Security Committees

4.0 SEPP Program Description
- 4.1 Planning
- 4.2 Organization
- 4.3 Equipment
- 4.4 Training and Procedures
- 4.5 Emergency Exercises and Evaluation

5.0 Threat and Vulnerability Identification, Assessment, and Resolution
- 5.1 Threat and Vulnerability Identification
  - 5.1.1 Asset Analysis
  - 5.1.2 Security Data Collection for the Identification of Threats and Vulnerabilities
  - 5.1.3 Other Sources of Information – Security Reviews, Testing and Inspection Programs
  - 5.1.4 Identifying Threats for Prioritized Assets
  - 5.1.5 Identifying Vulnerabilities
- 5.2 Threat and Vulnerability Assessment
- 5.3 Threat and Vulnerability Resolution

6.0 Implementation and Evaluation of SEPP
- 6.1 Implementation Tasks for Goals and Objectives

	6.2	Implementation Schedule
	6.3	Evaluation
7.0	Modification of SEPP	
	7.1	Initiation
	7.2	Review Process
	7.3	Implement Modifications

3.3 Annual Review of MTA SEPP

The MTA shall conduct an annual review of its SEPP and update it as necessary to ensure that the SEPP is current at all times. MTA shall complete the review for the previous calendar year and submit a revised SEPP to MDOT by March 1. As appropriate, referenced materials affected by the revision(s) should also be submitted with the SEPP.

Each revised SEPP submitted to MDOT by MTA shall include a text or tabular summary that identifies and explains proposed changes and includes a time frame for completion of the associated activities. MDOT will review subsequent SEPP submissions from MTA using the SEPP checklist found in Appendix B. Upon approval of modifications, MDOT will issue to MTA written approval of its SEPP within 30 calendar days and a copy of the completed SEPP review checklist.

In the event that the MTA conducts its annual SEPP review and determines that no update is necessary for that year, it must prepare and submit by March 1 formal correspondence notifying MDOT of this determination. If MDOT wishes to object to this determination, MDOT will notify MTA within 30 days.

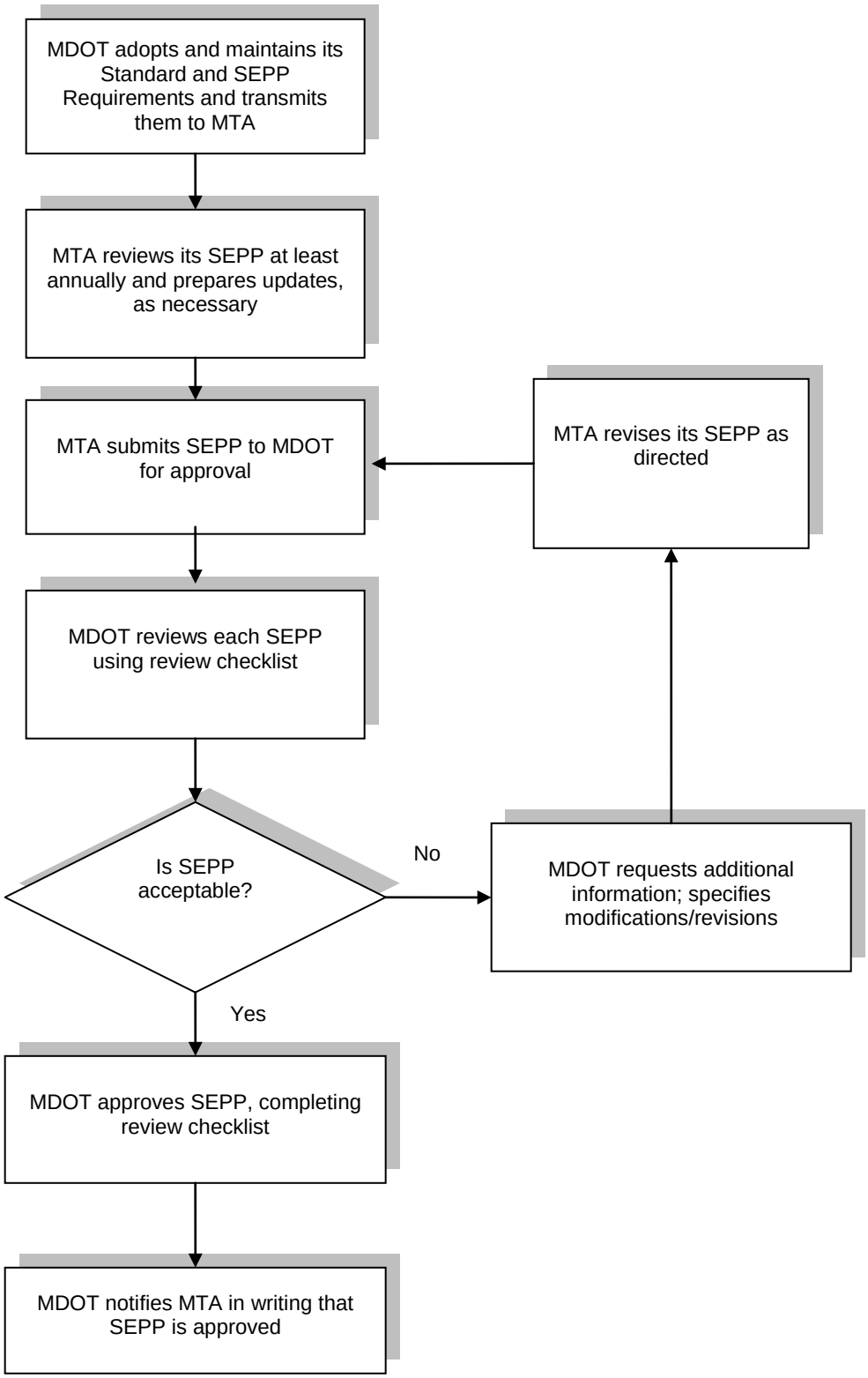
Additional reviews of the MTA SEPP may be required to address specific issues based on revisions to MDOT's program standard or procedures, revisions to FTA 49 CFR 659, review results, on-site reviews, investigations, or changing trends in crime data or terrorism threat levels. Upon receipt of a written notification from MDOT for SEPP modifications, MTA shall submit a revised SEPP to MDOT within 30 calendar days. MDOT will review and approve the revised SEPP, providing a formal approval letter and a completed review checklist (if appropriate for the change). This review and approval process will be completed 30 days after receipt of the modified SEPP.

In the event that MTA initiates updates outside of the annual review cycle, MTA shall submit the modified SEPP, and any subsequently modified procedures, to MDOT for review and approval within 30 calendar days of the effective date of the change.

MDOT encourages MTA to ensure that submissions of updated SEPPs are also made to DHS/Office of Grants and Training and TSA, following the conditions specified in grant program, directives or other requirements and regulations administered by these agencies.

Figure 4 provides a visual depiction of the MDOT SEPP review and approval process.

Figure 4: SEPP Approval Process



3.4 SEPP Submittals from New Starts Projects

At present, the only Rail Transit Agency in the State of Maryland covered by MDOT's Rail Safety Oversight Program is the Maryland Transit Administration. Should a transit agency begin the process of offering rail service, MDOT will revisit its Program Standard at the outset of the New Starts process. Furthermore, any major capital expansion or service extension (consistent with the FTA definition) at the MTA will be considered a "new start."

An RTA New Starts project shall make an initial submittal of a SEPP and all referenced procedures/materials to MDOT at least 180 calendar days before beginning passenger service operations. This submission shall be made following any restrictions placed on these materials by either the RTA or MDOT to ensure their protection from public release. The initial SEPP shall be approved and adopted by the RTA as part of the New Starts project safety certification process.

MDOT will review and approve the initial SEPP using its review checklist, and will transmit a formal letter of approval and the completed checklist to the RTA point-of-contact. During its review, MDOT may make requests for addition information, revisions or modifications. Any additional requirements will be conveyed by MDOT.

3.5 SEPP Readiness Review

MDOT reserves the right to conduct an on-site SEPP Readiness Review of any New Starts project. This review would be conducted after receipt of the RTA's initial SEPP submission but prior to its entry into passenger operations. This assessment would focus on the capabilities of the RTA to implement its SEPP during passenger operations. This assessment may be conducted in conjunction with MDOT review and approval of the initial SEPP submission.

This assessment may be conducted formally, following the procedures specified for the Triennial Safety and Security Review, identified in Section 7 of this document. Or this assessment may be conducted less formally, as an on-site walk-through of the RTA's security and emergency preparedness program with the RTA's security point-of-contact and other RTA personnel to ensure both the accuracy of its initial SEPP submission and the capacity of the RTA to implement its SEPP.

Based on the type of review conducted, MDOT may issue an official report with required corrective actions (see Section 7 of this document), or may address any findings through the review and approval process used for the RTA's SEPP.

4 Internal Safety and Security Review Program

4.1 Objectives

The section describes MDOT requirements for the internal safety and security review program to be implemented by MTA.

4.2 Minimum Requirements for Reviews

As described in the SSPP and SEPP, MTA must implement a process for the performance of ongoing internal safety and security reviews to ensure the implementation of the MTA SSPP and SEPP, and to evaluate the effectiveness of these plans. To ensure compliance with FTA's 49 CFR Part 659.27, MTA must:

- Develop and submit to MDOT an internal safety and security review schedule, which addresses all required 21 elements of the SSPP (Part 659.19) and all seven (7) required elements of the SEPP (Part 659.23), over a three-year cycle. At a minimum, annual updates of this schedule must be provided to MDOT with the annual report discussed in Section 4.3 below.

- Develop checklists and procedures for conducting each of the 21 required SSPP reviews. These checklists and procedures must contain appropriate criteria for determining whether all of the provisions contained in the 21 elements of the SSPP are being implemented at MTA, in addition to evaluating whether the SSPP itself contains all of the required provisions described above. As such, checklists and procedures developed by MTA must formally reflect MTA's own internal review process, *separate* from the SSPP Review Checklist in Appendix A of this document, which is only for ensuring that the SSPP contains all of the required elements and does not by itself comprise an appropriate internal safety review checklist and/or procedure. .

- Develop checklists and procedures for conducting each of the seven (7) required SEPP reviews. These checklists and procedures must contain appropriate criteria for determining whether all of the provisions contained in the seven (7) elements of the SEPP are being implemented at MTA, in addition to evaluating whether the SEPP itself contains all of the required provisions described above. As such, checklists and procedures developed by MTA must formally reflect MTA's own internal review process, *separate* from the SEPP Review Checklist in Appendix B of this document, which is only for ensuring that the SEPP contains all of the required elements and does not by itself comprise an appropriate internal safety review checklist and/or procedure. .

- Notify MDOT not less than 30 days prior to the conduct of any and all internal safety or security reviews. Notification must be in writing and may be transmitted to MDOT via memorandum, email or fax. Notification should include the time and location of the internal review. MDOT retains the authority to participate in any and all internal reviews.

- In addition, at the time of notification, checklists and procedures relevant for the review being conducted must be submitted to MDOT. These materials may be submitted to MDOT in electronic copy via email or in hard copy via mail or fax. For security reviews, any special provisions established by MTA or MDOT to ensure the protection of these

materials must be followed.

- Based on the results of each review conducted, MTA must prepare a written report documenting recommendations and any corrective actions identified as a result of the review. Each report and resulting corrective action plans must be submitted and approved by MDOT within 60 days of the conclusion of each internal safety and security review.

- MTA must also prepare an **Internal Safety and Security Review Findings Log** to track through to implementation all findings, recommendations, and corrective actions developed as a result of the internal safety and security review process. This log should be available to MDOT and may be referenced during activities performed in support of the Hazard Management Process (discussed in Section 5 of this document).

4.3 Minimum Requirements for Annual Internal Safety and Security Review Report

By January 31 of each year, MDOT requires MTA to submit an annual report to MDOT that documents the internal reviews conducted for the previous year. This report may be submitted in electronic copy via email or in hard copy via mail or fax. For sections devoted to the results of security reviews, any special provisions established by MTA or MDOT to ensure the protection of these materials must be followed.

This annual report must include:

- a listing of the internal safety and security reviews conducted for that year;
- a discussion of where MTA is in meeting its three-year internal review schedule, including the identification of any obstacles in meeting the schedule and any proposed mitigation measures;
- an updated schedule for the next year's reviews;
- the status of all findings, recommendations and corrective actions resulting from the reviews conducted that year; and
- any challenges or issues experienced by the MTA system safety function or security/police function in obtaining action from/compliance with these findings, recommendations and corrective actions during that year.

MDOT will review this report using the checklist contained in Appendix D within 30 days, and either approve or disapprove the report. If MDOT is unable to approve the report, MDOT staff may request additional information, clarifications or revisions from the MTA safety or security point-of-contact. A meeting or teleconference may also be conducted to address any issues identified by MDOT during its review of the annual report. Any additional requirements will be conveyed to MTA by MDOT.

In addition to the annual report, also by January 31, MDOT requires that MTA submit a formal letter of certification, signed by the rail transit agency's chief executive, stating that, based on the evaluation performed during the internal safety and security review process during the previous year, MTA is in compliance with its SSPP and SEPP.

If MTA determines that findings from its internal safety and security reviews indicate that MTA is not in compliance with its SSPP, the chief executive must then identify the activities that MTA

will take to achieve compliance. MDOT must review and approve the MTA certification letter and action plan using the procedures specified in Section 8 of this document.

5 Hazard Management Process

5.1 Objective

This section describes MDOT requirements for the MTA Hazard Management Process. The objective of this process is to provide MDOT with an ongoing role in overseeing MTA's identification, assessment, and resolution of hazards.

5.2 Application Criteria and Minimum Requirements

To fully comply with MDOT hazard management process requirements, the MTA SSPP must clearly develop and document a comprehensive process to identify, report, evaluate, prioritize, control, track, and resolve hazards. MTA must apply its hazard management process to all known hazards, including hazards discovered during reviews, audits, inspections, and investigations, as well as hazards reported by employees, contractors, or other observers.

MTA must apply its hazard management process to all other hazards discovered by MTA personnel during the normal course of revenue and non-revenue service operations. Applicable hazards may also stem from new starts projects, extensions, modifications of existing systems, operational or environmental changes, and other known or yet-to-be-revealed sources.

The MTA hazard management process should also contain proactive measures that are specifically intended to identify and document hazards. Proactive hazard identification measures should include practices applied continuously in the normal course of operations and maintenance activities, as well as periodic hazard identification campaigns targeting specific areas of interest.

At a minimum, the MTA hazard management process contained in the MTA SSPP must:

- define MTA's overall approach to hazard management, including goals and objectives of the MTA Hazard Management Program;
- describe the implementation of an integrated, system-wide MTA hazard resolution process;
- specify all sources and mechanisms used by MTA to identify hazards;
- include both continuous MTA hazard identification methods and periodic, targeted hazard identification campaigns at MTA;
- define the MTA process for evaluating, prioritizing, controlling, and eliminating hazards;
- describe the MTA tracking mechanism applied to all hazards from the original hazard detection through the resolution, control, and/or elimination of the hazard;
- define minimum notification and reporting thresholds implemented by MTA to inform MDOT of hazards;
- specify the process by which MTA will provide ongoing reporting of hazard resolution activities to MDOT; and
- identify and describe MTA methods for evaluating the effectiveness of the hazard management and resolution process.

5.3 Prioritization of Hazards

High and serious Priority 1 and Priority 2 hazardous conditions are defined as meeting the standard in the Hazard Risk Index and Hazard Risk Categories of the MTA SSPP. These include any Hazard Risk Assessment Values of 1 through 9. MTA must ensure that the MTA SSPP clearly defines high priority (Priority 1 and Priority 2) hazards. MTA must also ensure all other hazards are prioritized according to the Hazard Risk Assessment Values scale.

The MTA SSPP must specify that Priority 1 and 2 hazards include, but are not limited to, near misses, red signal violations, other operational rule violations, incident trends, and maintenance failures.

To ensure additional priority assignment accuracy, and to ensure that all critical MTA departmental stakeholders are made aware of high priority hazards, the MTA SSPP should establish a system-wide tool to support collection of all relative information for analyzing hazards. The MTA SSPP should provide a separate and distinct section to ensure an enhanced level of attention is applied across all Priority 1 and 2 hazards at MTA. The section should also emphasize the importance of tracking Priority 1 and 2 hazard corrective actions.

The MTA SSPP should require the development of a formal process to require appropriate MTA internal departments to review operational data to identify safety issues and hazards and to ensure that identified hazards are adequately addressed within an appropriate timeframe.

The MTA SSPP must emphasize the importance of reporting high priority hazards. Further, the MTA SSPP must specify and implement a control process that ensures a consistent identification and notification procedure is applied across all Priority 1 and 2 hazards. The MTA SSPP must also indicate distinct thresholds for reporting Priority 1 and 2 hazards, and it must also specify frequencies for reporting.

5.4 Minimum Criteria for Identification, Tracking, Notification, and Investigation/Reporting

MTA must notify MDOT by telephone or fax of all suspected or assessed high and serious Priority 1 and 2 hazardous conditions within one business day of discovery. After the initial notification, MTA shall submit the Preliminary Hazardous Condition Report found in Appendix C to MDOT by fax or email.

To ensure that MTA tracks hazards and that MDOT is notified of all hazardous conditions affecting rail safety or security, MTA shall consider each item in the following list to comprise Priority 1 and 2 hazards:

Identification, Tracking, Notification, and Reporting Requirements for Specified Hazards:

Hazard Type	Must Be Tracked in MTA Hazard Log? (Y/N)	Must Be Reported to MDOT Within One (1) Business Day of Discovery?	Must Be Investigated by MTA?
Incidents involving employees working in an MTA right-of-way that are investigated by MTA	**Y**	**Y**	**Y**
Malfunctions of safety critical systems that could result in a catastrophic or single-point failure	**Y**	**Y**	**Y**
All derailments along Light Rail and Metro, including derailments within yard limits – note that main line derailments also fall under the notification and investigation criteria set forth in this document.	**Y**	**Y**	**Y**
Broken or missing safety-critical equipment, infrastructure, or systems that could result, or have resulted, in employee or passenger injury, or damage to MTA property.	**Y**	**Y**	**Y**
Discoveries of systemic or patterns of employee non-compliance with MTA rules and procedures.	**Y**	**Y**	**Y**
Rail transit vehicle collisions with fixed objects on the mainline or in the yards.	**Y**	**Y**	**Y**
Face-up or near miss of rail vehicles.	**Y**	**Y**	**Y**
Grade crossing warning system activation failure.	**Y**	**Y**	**Y**
Speed restriction or track closure due to track or system damage.	**Y**	**Y**	**Y**
Fire or smoke on a track, on a vehicle, or in a facility.	**Y**	**Y**	**Y**

Hazard Type	Must Be Tracked in MTA Hazard Log? (Y/N)	Must Be Reported to MDOT Within One (1) Business Day of Discovery?	Must Be Investigated by MTA?
Broken or loose wheel or axle.	**Y**	**Y**	**Y**
Split switch without derailment.	**Y**	**Y**	**Y**
Unintended train uncoupling during revenue service.	**Y**	**Y**	**Y**
Signal violations or overruns.	**Y**	**Y**	**Y**
Unauthorized train encroachment or overrun into work zone.	**Y**	**Y**	**Y**
Vehicle door openings on the wrong side, off station platforms, or during train movement.	**Y**	**Y**	**Y**
Incapacitated operator in revenue service.	**Y**	**Y**	**Y**
Exposed energized electrical conductors or equipment that can be contacted by passengers or employees.	**Y**	**Y**	**Y**
Employee or patron electric shock.	**Y**	**Y**	**Y**

5.5 Hazard Tracking Log

The MTA SSPP must specify the approach to identifying and assessing hazards. MTA may use a number of methodologies to determine and evaluate hazards, including:

- informal processes, such as reports from operations and maintenance personnel,
- results from rules compliance checks and employee evaluations,
- the mining of maintenance data,
- results from facilities and vehicles inspections,
- findings from internal safety and security reviews, and
- daily review of MTA's unusual occurrences log.

MTA may also apply:

- trend analyses, hazard classifications, and resolutions using the Mil-Std 882 process,
- hazard analyses using inductive processes (Preliminary Hazard Analysis, Failure Modes and Effects Analysis, Job Hazard Analysis, etc.) and
- hazard analysis using deductive processes (Fault Tree Analysis).

MTA must identify the process for consolidating all hazard information into a single, coordinated process. The comprehensive process should utilize the most effective tools, such as

worksheets, forms, databases, and other mechanisms to support a standardized and organized hazard database or Hazard Tracking Log.

The Hazard Tracking Log must contain all hazards identified through the various methods applied by MTA. The Hazard Tracking Log should be organized in a way that is most effective and efficient for MTA to ensure that all hazards are being identified, tracked, resolved, and so on. The Log should also clearly indicate the Hazard Priority so that all stakeholders may easily identify critical-level items. Figure 5 provides a sample hazard tracking log.

Figure 5: Sample Hazard Tracking Log

MTA Hazard Tracking Log							
Control No.	Description	Date Identified	Source	Priority	Assessment Results	Recommendations	Status

- Control No. – refers to the number assigned to the hazard by MTA.
- Description – refers to a brief narrative summary of the hazard – what it is; where it is located; what elements it is comprised of; etc.
- Date Identified – refers to the date the hazard was identified at MTA.
- Source – indicates the mechanism used to identify the hazard, i.e., operator report, near-miss, accident investigation, results of internal safety or security review, rules compliance or training program; maintenance failure, facility or vehicle inspection, trend analysis, formal hazard analysis, etc.
- Priority – clearly indicates the level of urgency associated with each hazard.
- Assessment Results – refers to the hazard severity and hazard frequency ratings initially assigned to hazard by MTA.
- Recommendations – refers to the actions recommended by MTA to address the hazard and to bring it into a level of risk acceptable to management.
- Status – refers to the status of the recommendations. Status may be designed as not started, open, in progress, or closed.

MTA must submit the proposed Hazard Tracking Log to MDOT as part of the MTA SSPP for review and approval by MDOT. Upon approval, MTA must submit the log to MDOT on a quarterly basis in electronic format via email, in hard copy via postal mail, or via fax. MDOT will review the Hazard Tracking Log and forward any questions or requests for information to the MTA safety point-of-contact identified in §1.5 of this document.

5.6 Investigation of Hazards

MTA or its contractor must investigate certain severe hazardous conditions in accordance with the provisions specified by MTA in its SSPP and the Hazard Management Process and Accident Investigation Procedure submitted to and approved by MDOT. At a minimum, MTA shall investigate all Priority 1 hazardous conditions. Upon notification of a hazardous condition by MTA, MDOT may formally request that MTA conduct an investigation. MTA shall maintain a file of hazards reported to MDOT and make these files available to MDOT for review and evaluation.

5.6.1 Initial Investigation Report

MTA shall submit to MDOT the Preliminary Incident Report of its investigation of the hazard within 72 hours of the hazard being reported to MDOT. MTA may transmit an electronic copy via email or a hard copy via mail or fax.

5.6.2 Status Investigation Reports

MTA shall submit to MDOT status reports of the hazard investigation at least monthly until the investigation is completed. MTA may transmit these status reports as an electronic copy via email or as hard copy via mail or fax.

5.6.3 Final Investigation Report

Upon completing the investigation of the hazard, MTA shall prepare and submit to MDOT for review and adoption a final report that includes a description of activities, findings, identified causal factors, and a corrective action plan. MTA shall transmit an electronic copy of the final investigation report to MDOT via email. Within 15 calendar days of receiving a report designated as final, MDOT will review the report, using the process specified in Section 6 of this document. Within 15 calendar days of acceptance of the MTA investigation report, MDOT will issue to MTA written approval and adoption of the report. In the event that MDOT does not accept the MTA report, MDOT will communicate in writing the area(s) of disagreement or concern. The report shall not be considered final until all conditions are met and the report is approved by MDOT.

5.6.4 Corrective Action Plans (CAP)

MTA shall develop a corrective action plan to correct those elements or activities identified as deficient during the course of a hazard investigation. In addition, MDOT may, during the course of an investigation, identify corrective actions to avoid or minimize the reoccurrence of the unsafe condition or address a related, systemic problem. Procedures associated with development, submission, review and approval of corrective action plans are the subject of Section 8 of this document. At any time during an investigation, MDOT reserves the right to request a full briefing from MTA on the known circumstances of the investigation, including corrective actions.

5.6.5 MDOT Investigation of Hazards

MDOT reserves the right to conduct independent investigations of identified hazards. A description of the MDOT investigation process is provided in Section 6.3.2 of this document.

Upon its determination to conduct an independent investigation, MDOT will inform MTA in writing of its intention to conduct an investigation of a reported hazard no later than 7 calendar days following receipt of the MTA initial report. MDOT will advise MTA of the following:

- investigation processes;
- identity of individual(s) conducting the investigation; and
- tentative schedule of investigation elements.

MTA shall assist the MDOT investigators by providing required information and resources necessary for conducting the investigation. MDOT or its contractor will complete an investigation report that includes a description of activities, findings, identified causal factors, and a corrective action plan. The report will be finished within 30 calendar days after completion of the investigation, and will be delivered to MTA for review. MTA will have 15 days to prepare a corrective action plan and submit it to MDOT.

6 Accident Notification, Investigation and Reporting

6.1 Objective

This section addresses the requirements in place for the notification, investigation and reporting of accidents meeting the thresholds specified in FTA's 49 CFR Part 659.33 or as required by MDOT.

6.2 Minimum Requirements

6.2.1 Initial Notification

MTA shall notify MDOT within 2 hours of any safety or security event involving a rail transit vehicle or taking place on MTA controlled property where one or more of the following occurs:

- a fatality at the scene; or where an individual is confirmed dead within 30 calendar days of a transit-related incident;
- injuries requiring immediate medical attention away from the scene for two or more individuals;
- property damage to MTA Rail Transit vehicles, non- MTA Rail Transit vehicles, other MTA Rail Transit property or facilities, and non- MTA Rail Transit property that equals or exceeds $25,000;
- an evacuation due to life safety reasons;
- a collision at a grade crossing; (all collisions at intersections between a MTA Rail Transit vehicle and any other vehicle in Light Rail mixed traffic situations are reportable as grade crossing collisions)
- a main-line derailment;
- a collision with an individual on an MTA Rail Transit right of way; or
- a collision between an MTA Rail Transit vehicle and a second MTA Rail Transit vehicle or an MTA Rail Transit non-revenue vehicle.

MTA shall notify the MDOT RSOA of an incident by phone, regardless of the time of day. If MTA is unable to contact the MDOT RSOA point of contact by phone, an e-mail with all of the incident facts must be sent to all MDOT RSOA points of contact.

MTA shares track (at one particular crossing) with the general railroad system and is subject to the Federal Railroad Administration (FRA) notification requirements. MTA shall notify MDOT within 2 hours of an incident for which MTA must also notify the FRA.

6.2.2 Incident Reports

MTA shall provide a Preliminary Incident Report to MDOT within 72 hours of the incident. MTA shall provide a Draft Final Incident Report to MDOT in electronic copy via email within 30 days. The following information shall be provided by MTA in the Final Incident Report of the event. If the information is not pertinent to the event, the item should be identified on the Final Incident Report as "non-applicable" (N/A). The report includes, but may not be limited to descriptions of the following:

- Name and Job Title of person reporting accident, incident or hazardous condition
- Event Type (fatality, injuries, property damage, evacuation, derailment or other)

- Location, Time, Date
- Fatalities
- Injuries
- Rail transit vehicle(s) involved (type, number)
- Other vehicle(s) involved (type, number)
- Property damage estimate (attempt shall be made to report actual dollar amounts)
- NTSB reportable
- FRA reportable
- MTA primary person (i.e., Chief Investigator) conducting the investigation (name, title, phone numbers and email address)
- Physical Characteristics of the Scene
- Interview Findings
- Sequence of Events
- Probable Cause (s) and Contributing Factors
- Conclusions
- Recommendations and Corrective Actions
- Document Control Number
- Attachments that include all related reports (i.e., Service Quality, police, operator, witness statements, photographic evidence)

If MDOT is not satisfied with the Draft Final Report or does not approve the proposed CAPs the MTA shall provide additional information at MDOT's request. If MDOT is satisfied with the Draft Final Report it will be adopted and a written MDOT Incident/Accident Adoption Report will be provided within 15 days, at which point the report becomes the Final Incident Report. MDOT shall be notified of all accidents which, while not reportable, may identify a hazardous condition within twenty four (24) hours of their occurrence. Should a non-reportable accident represent high or serious priority 1 and 2 hazardous condition as defined in the Hazard Risk Index and Hazard Risk Categories, MTA shall report them within two (2) hours as required in section 5.4 of this standard.

6.3 Investigations of Reportable Events

49 CFR Part 659.35 requires MDOT to investigate, or cause to be investigated, at a minimum, any incident involving a rail transit vehicle or taking place on rail transit-controlled property meeting the notification thresholds identified in Section 6.2. In conducting these investigations, MDOT may authorize MTA to conduct an investigation on its behalf, conduct its own independent investigation, or, if the NTSB is investigating the accident, join in the investigation through NTSB's Party System.

6.3.1 MTA Conducts Investigation on Behalf of MDOT

In general, MDOT authorizes MTA to conduct accident investigations on its behalf, unless otherwise notified. For all investigations conducted by MTA on behalf of MDOT, MTA must use investigation procedures that have been approved by MDOT.

MTA must submit any updates and revisions to its accident investigation procedures to MDOT as they are completed and implemented by MTA or with the annual update of the SSPP. These procedures should be treated as part of the SSPP.

In the event that authorization is conferred upon MTA to conduct the investigation, MDOT may participate in the investigation process. The terms of participation are specified in the MTA SSPP and in the MTA accident investigation procedures.

Each MTA investigation conducted on behalf of MDOT must be documented in a final report that includes a description of investigation activities, findings, identified causal factors, and a corrective action plan, if applicable.

At its discretion, and as specified in its accident investigation procedures, MTA may separate its investigation report into two parts: (1) Preliminary Incident facts and summary report; (2) description of investigation activities, investigation findings, and determination of the most probable cause and additional contributing causes; and recommendations to prevent recurrence, including a corrective action plan.

The investigation report prepared by MTA shall be submitted to MDOT within 30 calendar days following incident and completion of the investigation. Until the investigation is completed, MTA shall prepare and submit monthly status investigation reports. The status investigation reports at a minimum shall include:

- minutes of any meeting held by an MTA ad hoc reportable event investigation committee or contractor;
- disclosure of any immediate corrective actions MTA has planned or completed;
- principal issues or items currently being evaluated; and
- overall progress and status of the investigation.

At any time during an investigation, MTA shall be prepared to provide a full briefing on the known circumstances of the event, status of MTA or NTSB investigation, and investigation activities.

Upon receipt of the MTA accident investigation report, MDOT will review the report. In the event that MDOT does not agree with the description of the investigation, the identification of primary and contributing causes, or the findings of the MTA report, MDOT shall communicate in writing to the MTA safety-point-of-contact the area(s) of disagreement or concern. MDOT will work with the MTA to address these issues in the MTA's accident investigation report. In the event that agreement cannot be reached on these issues, MDOT will issue its own accident investigation report, which may be no more than the MTA report and the MDOT dissent.

MDOT approval must be obtained on the corrective action plan portion of the MTA accident investigation report and each corrective action plan must be submitted to MDOT following the procedures described in section 8 of this standard. In the event that MDOT takes issue with MTA's proposed corrective action plan, MDOT and MTA must work together until MDOT approval can be obtained.

To reduce the potential for conflict, MDOT encourages MTA to submit a draft version of the accident investigation report to MDOT so that agreement may be obtained on the most probable cause, additional contributing causes, corrective action plan, and an implementation schedule before the report is finalized and formally issued by MTA.

Reports and records of accident investigations submitted to MDOT by MTA, as well as related reports and records produced by both MDOT and MTA, will be treated as confidential information, and will not be released without concurrence by both MDOT and MTA.

6.4 Independent MDOT Investigations

At its discretion, MDOT may choose to conduct an independent investigation of any accident meeting the thresholds specified in Section 6.2 utilizing its own personnel or an authorized contractor. Any investigation conducted by MDOT or its contractor must be in accordance with the approved MTA investigation procedures. MDOT investigations may also follow the American Public Transportation Association (APTA) Standard for Rail Transit Accident/Incident Investigation (Volume 4 - Operating Practices APTA RT-S-OP-002-02 dated 7/26/04). This referenced standard has been submitted to FTA as part of MDOT's Initial Submission.

MDOT will inform MTA of its intention to conduct an investigation or participate in an MTA investigation of a reported event no later than 7 calendar days following receipt of the MTA initial report. MDOT will advise MTA as to the personnel who will be conducting the independent investigation, and provide a preliminary schedule as to the investigation process.

All MDOT authorized accident investigation personnel are granted authority under the state safety oversight program to conduct an investigation and evaluate records, materials, data, analysis, and other information which is pertinent to the investigation. It is expected that MTA will provide to the MDOT investigation team the resources and information necessary to conduct the investigation in an effective and efficient fashion.

MDOT accident investigation personnel may conduct field analysis, operational surveys, interviews, record checks, data analysis, and other on-site and off-site tasks which may be necessary for a comprehensive investigation. If MDOT accident investigation personnel require information or analysis which is not readily available, or which may require additional resources by MTA, it will request this data in a written request to MTA safety point-of-contact via email or memorandum.

In conducting its investigation, MDOT will, at a minimum, perform the following activities:

- MDOT will assign a team of qualified personnel to investigate the accident (off and on-site). The team will include individuals with technical expertise in the type of accident being investigated. For example, a vehicle expert would be included in a team conducting the accident investigation for an accident involving a rail vehicle mechanical failure. Technical areas of specialization may include:
  - System Safety
  - Safety Training
  - Transportation Management and Operations
  - Substance Abuse Programs
  - Vehicles and Vehicle Maintenance
  - Worker Health & Safety, Facility Safety, & Hazardous Materials
  - Emergency Operations
  - Track, Structures, Signals & Communications
  - Transit System Security

- The MDOT on-site team will wait until MTA and/or other emergency response personnel have secured the accident/incident scene area before commencing its on-site accident investigation. MDOT reserves the right to request that MTA hold the accident scene to the maximum extent feasible until the arrival of MDOT Rail State Safety Oversight representatives when a MDOT accident investigation is planned or requested.

- The MDOT team will assess physical evidence of the accident scene including: damage and debris analysis; skid mark analysis; and the use of measurements, diagrams and photographs. They also will document the environmental and physical factors of the accident scene.

- As part of the accident/incident investigation MDOT will also assess compliance with operating rules and procedures; conduct follow-up interviews (if required); analyze employee records and the results of post accident drug and alcohol tests; and conduct vehicle and equipment inspections.

- All information gathered from the accident/incident investigation will be documented and included in the MDOT accident investigation report.

- Within 30 work days of completion of the on-site and off-site accident investigation requirements, the MDOT investigation team will prepare a draft accident investigation report.

- The draft accident investigation report will be provided to MTA for its review. Comments will be due to MDOT 10 work days after initial MTA receipt of the draft report. If necessary, a meeting to discuss the draft report will also be held between MDOT and MTA.

- If necessary and based upon the comments received from the transit agency, the draft report will be revised.

- A final accident investigation report will be issued by MDOT within 30 work days of the end of the comment period.

MTA will be required to review the final MDOT accident investigation report, and within 10 days after receiving it, either (1) provide concurrence to implement the MDOT-proposed corrective action plan or (2) submit an alternate corrective action plan to MDOT for review and approval.

6.4.1 NTSB Investigations

The NTSB may investigate a reportable event to achieve its primary function to promote transportation safety. In such case, the NTSB is responsible for the investigation; the determination of facts, conditions, and circumstances; the cause or probable cause or causes; and recommendations to reduce the likelihood of recurrence. MDOT will support the NTSB as a member of its Party System.

In the event of an NTSB investigation, MTA shall be responsible for briefing MDOT in a timely manner on NTSB activities including meetings, interviews, requests for data, functional testing, examination of equipment, and the results of drug and alcohol tests. MTA shall provide MDOT with a copy of all written correspondence to the NTSB concerning a reportable event or investigation, and also shall provide MDOT a copy of all NTSB reports and any recommendations concerning the event or its investigation, upon receipt by MTA. MDOT will assist the NTSB by providing information requested about MTA critical practices and other matters as appropriate.

If the NTSB releases preliminary findings and recommendations, MDOT is authorized to participate in any discussions and reviews with MTA and NTSB. MDOT and MTA will review the

NTSB findings, draft, and final reports and make a determination of whether or not to adopt the NTSB recommendations. Should the NTSB recommendations be adopted, MTA shall implement the findings and each corrective action plan must be submitted to MDOT following the procedures described in section 8 of this standard.

7 Triennial On-site Safety and Security Review

7.1 Objective

This section addresses MDOT's procedures for the Triennial Safety and Security Review to be performed on-site at MTA. This review will determine the extent to which MTA is meeting its SSPP and SEPP requirements, the effectiveness of the SSPP and SEPP, and whether the SSPP and SEPP should be updated.

7.2 Minimum Requirements

As specified in 49 CFR Part 659.29 at least every three (3) years, MDOT must conduct an onsite review of MTA's implementation of its SSPP and SEPP. Alternatively, this on-site review may be conducted in an ongoing manner over the three-year timeframe.

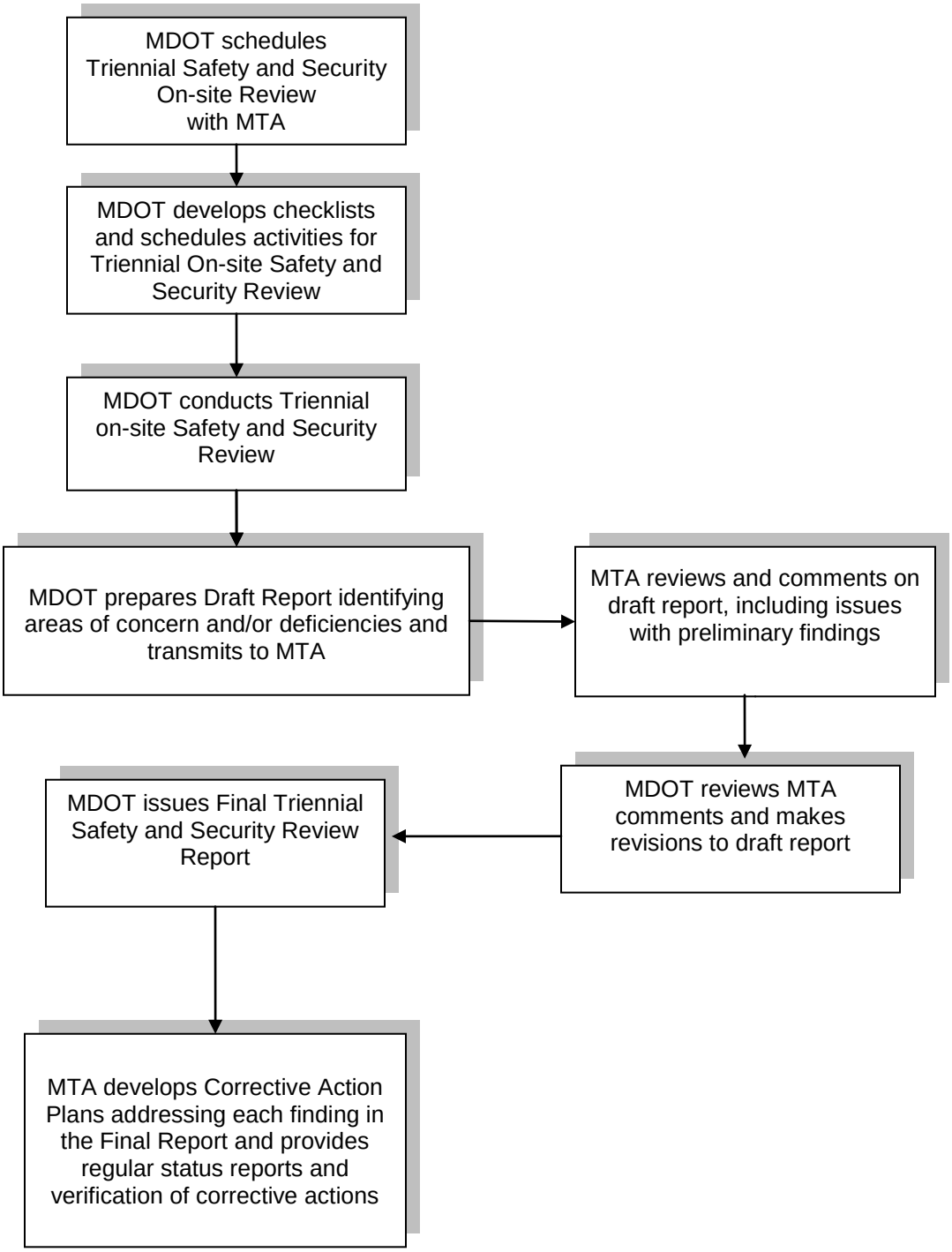
In conducting the MDOT Triennial Review, MDOT will establish a review team and prepare a schedule, procedures and a checklist to guide the review process. Criteria will be established through which MDOT can evaluate MTA's implementation of its SSPP and SEPP.

As the conclusion of the review, MDOT will prepare and issue a report containing findings and recommendations resulting from the review, which will analyze the effectiveness of the SSPP and SEPP and whether either should be updated. Corrective actions required as a result of this review will be managed through the process described in Section 8 of this document.

MDOT will submit its completed report for the triennial safety and security review to FTA as part of its Annual Submission.

Figure 6 shows the Triennial Safety and Security Review process.

Figure 6: Triennial Safety and Security Review Process



7.3 Process and Procedure

7.3.1 Pre-Review Preparations

MDOT will determine whether the review will be conducted by MDOT personnel, a contractor, or a combination of both. If a contractor is to be used, required activities will be added to the milestone schedule to ensure that contractor services are available in time to plan for and conduct the review.

MDOT will establish a schedule for conducting the review. This schedule will include milestones for the development of checklists to guide the review, notification of MTA regarding the review, conduct of a pre-review meeting with MTA, conducting the review, preparation of a draft report, delivery of the draft report to MTA, issuance of a final report, and the receipt, review, approval and tracking through to implementation of MTA corrective action plans.

Based on the milestone schedule, MDOT will assign a team of MDOT and/or contractor personnel to conduct the review. Each team shall have a designated lead reviewer and supporting team members.

Once assigned, the team will begin its work by reviewing in detail the MTA's SSPP, SEPP, and referenced and supporting procedures and materials. These materials, as well as FTA guidance on performing three-year reviews, will form the basis of MDOT's review checklist. As necessary, while preparing this checklist, MDOT may contact the MTA's safety or security point-of-contact and request additional information, procedures, or documentation. These requests may be transmitted via email, memorandum or fax. For example, the team may request and review the MTA's operating rule book, bulletins, orders, instructions, and procedures; maintenance manuals and procedures for vehicles, track and signals; design criteria and project engineering procedures for extensions or modifications; internal safety and security review checklists and reports; the results of the hazard management process; and the status of all corrective action plans.

Utilizing these materials, the team will complete its checklist development. This checklist will identify:

- the safety and security requirements to be reviewed;
- the applicable reference documents that establish the acceptance criteria for those requirements; and
- the method of verification.

Space shall also be provided on the checklists to record the results of the review. Once the checklists are completed, MDOT will formally notify the MTA safety and security points-of-contact of the upcoming review, no less than 60 days before the review is schedule. This notification will occur via memorandum.

Shortly after notification, MDOT may schedule a pre-review meeting with MTA for clarification of any questions and concerns, and coordination of daily schedules with MTA. Either during this meeting or via email or hard copy mail, MDOT will also transmit its review checklists to the MTA safety and security points-of-contact. The checklists will be delivered to MTA as soon as they are developed. Every attempt will be made to provide the checklists no later than 15 calendar days prior to the start date of the review.

7.3.2 On-Site Review

To begin the review, the MDOT team will conduct an entrance meeting with MTA to resolve any outstanding issues and verify the schedule previously agreed to during the pre-review meeting. The MDOT team will then conduct the on-site safety and security review using checklists developed during the pre-review period and transmitted to MTA.

In performing this review, the MDOT team will administer the checklists as specified, through interviews, document and record reviews, first-hand observations of operations and maintenance activities, spot checks, and visual examinations and measurements. Results will be recorded in the checklists. When the results indicate a deficiency or discrepancy with the acceptance criteria specified in the checklist, it will be noted and a supplemental form may be completed. At the conclusion of the on-site review, the MDOT team will conduct an exit meeting with MTA, providing an overview of the major findings, observations and concerns.

7.3.3 Draft and Final Triennial Safety and Security Review Reports

Following the completion of the on-site review, the MDOT team shall prepare a draft report with the completed review checklists and supplemental forms included as attachments.

This draft report will provide:

- Verification that the SSPP and SEPP are integral parts of MTA's overall management, engineering, operating, and maintenance practice and/or identification of deficiencies or areas requiring improvement.
- Verification that the SSPP and SEPP are reviewed, at a minimum, on an annual basis in order to ensure that they remain dynamic and viable documents and/or identification of deficiencies or areas requiring improvement.
- Verification that MTA regularly monitors compliance with the SSPP and SEPP, through a continuous and ongoing internal safety and security review process and/or identification of deficiencies or areas requiring improvement.
- Verification that MTA identifies potentially serious conditions, hazards, threats and vulnerabilities and ensures that methods to eliminate, control, and mitigate them are implemented and/or identification of deficiencies or areas requiring improvement.
- Verification that investigations are conducted following established procedures adopted by MTA and/or identification of deficiencies or areas requiring improvement.
- Verification that MTA's emergency preparedness and terrorism preparedness programs are being implemented as specified in the SSPP and SEPP and/or identification of deficiencies or areas requiring improvement.
- Verification that specific activities and tasks identified in the SSPP and SEPP are being carried out as specified in these plans and/or identification of deficiencies or areas requiring improvement.

A draft report shall be completed by the review team and submitted to MDOT for review and comment within 30 calendar days of the conclusion of the on-site review. MDOT and the review team shall have 15 days to resolve any issues with the draft report and submit to MTA. MTA shall have 30 days to respond to the draft report with questions and comments. MDOT and the review team will make any necessary revisions to the draft report and issue the final report no later than 90 days after the conclusion of the on-site review. The final report will contain

findings identified during the review period, and MTA will have 30 days to develop corrective action plans (CAPs) to address each of the findings.

While individual reports may vary, the basic outline used for the MDOT Triennial Safety and Security Review Report is presented in Figure 7.

MDOT will transmit the completed triennial on-site safety and security review reports to FTA as part of its Annual Submission.

Corrective action plans submitted by MTA to address review findings will be reviewed, approved and tracked through to implementation following the process specified in Section 8 of this document.

Figure 7: Sample Triennial Safety and Security Review Final Report Outline

A Executive Summary
B Introduction
C Methodology for Triennial Safety and Security Review
D MTA Implementation of Security and Emergency Preparedness Plan
E MTA Implementation of System Safety Program Plan

1. Policy Statement
2. Purpose, Goals and Objectives
3. Management Structure
4. Plan Review and Modification
5. Plan Implementation
6. Hazard Management Process
7. Safety Certification Process
8. System Modifications
9. Safety Data Acquisition
10. Incident Notification, Investigation, and Reporting
11. Emergency Management Program
12. Internal Safety Audit Program
13. Rules Compliance
    - Operations, Supervision and Control
    - Right-of-Way Safety Rule Compliance
14. Facilities and Equipment Inspections
    - Stations Maintenance
    - Elevator/Escalator Maintenance
    - Tunnels and Structures
    - Facility/Shop Safety
    - Communications
15. Maintenance Review and Inspection Program
    - Railcar Maintenance
    - Track Inspection and Maintenance
    - Traction Power
    - Signal Systems
16. Training and Certification Program
17. Configuration Management Process
18. Compliance with Local, State, and Federal Safety Requirements
19. Hazardous Materials Program
20. Drug and Alcohol Program
21. Procurement Program

F. Appendices

8 Corrective Action Plans

8.1 Objectives

This section addresses MDOT's procedure to ensure that corrective action plans are developed and implemented by MTA to address hazardous conditions identified through accident investigations, the hazard management process, deficiencies in MTA's implementation of its SSPP or SEPP, or recommendations specified by MDOT.

8.2 Minimum Requirements

MTA must develop corrective action plans for the following:

- results from investigations in which identified causal factors or recommendations are determined by MTA, NTSB or MDOT as requiring corrective actions; and
- findings from MTA Internal Safety and Security Reviews; and
- High and Serious priority 1 and 2 safety and security hazards, findings or deficiencies identified from any source; and
- findings from MDOT Triennial Reviews, including findings of "non-compliance" and findings of "compliance with recommendation."

Each corrective action plan that requires MDOT approval shall identify:

- corrective action plan identification number
- priority and/or risk category of hazard or deficiency
- source of hazard or deficiency
- a hazard or finding summary
- corrective action plan summary with planned activities or actions to resolve the deficiency or hazard
- MTA department head(s) and individual(s) responsible for implementing corrective actions
- scheduled completion dates for implementation
- an alternate or interim CAP in advance of implementing the ultimate CAP, if appropriate
- list of interim milestones for CAPs that require a longer implementation period

The reportable corrective action plans shall be submitted to MDOT for review and approval. In the event that MDOT and MTA dispute the need, findings, or enforcement of a corrective action plan, MDOT will allow MTA 30 calendar days to submit its case. MDOT will then issue final direction to MTA regarding the corrective action plan.

In the event that the NTSB conducts an investigation, MTA and MDOT shall review the NTSB findings and recommendations to determine whether or not to develop a corrective action. If a corrective action plan is required either by the NTSB or MDOT, MTA shall develop it.

MTA shall develop and maintain a Corrective Action Monitoring Log, which identifies all corrective action plans approved by MDOT and presents their status. This log shall be submitted quarterly to MDOT in electronic form via email or in hard copy via mail or fax, or at the quarterly Rail Safety Oversight meeting. As corrective action plans are closed out, MTA must submit verification that the corrective action(s) has been implemented as described in the corrective action plan or that a proposed alternative action(s) has been implemented. This

written verification should be submitted with the quarterly Corrective Action Plan Tracking Log in electronic or hard copy format. The verification should be in unalterable format electronically, and should bear a scanned or electronic signature. In the quarterly log, the MTA must also inform MDOT concerning any alternative actions for implementing a corrective action plan.

8.3 Notification

MTA shall develop a corrective action plan with the intent of addressing the hazard or deficiency identified as a result of an accident investigation, the hazard management process, or the external safety and security reviews performed by MDOT. MTA shall submit the corrective action plan to MDOT for approval within 30 calendar days after either MTA or MDOT has identified the need for a corrective action plan. Depending on the complexity of the issue requiring corrective action, and at MDOT's discretion, additional time may be granted to MTA to prepare the corrective action plan. All corrective action plans must be submitted to MDOT by the MTA Safety function. MDOT recognizes that the Safety function does not develop all corrective action plans; however, when an MTA department provides a CAP for submittal to MDOT, that CAP must include with it written verification of the Safety function's review and concurrence.

8.4 Corrective Action Plan Review and Approval

MDOT will notify the MTA of its approval or rejection of a corrective action plan within 15 calendar days of receiving the corrective action plan. In the event MDOT rejects a corrective action plan, MDOT will state its reasons in writing and recommend revisions. MTA shall submit a revised corrective action plan to MDOT no later than 15 calendar days following the rejection. MDOT approval is not necessary for short-term measures required to immediately mitigate hazardous conditions; however, these measures shall not replace the need for a long-term corrective action plan. MDOT will provide its support for such short-term measures, or outline its concerns regarding them, in its written approval or disapproval of the formal corrective action plan.

8.5 Monitoring and Tracking

The MTA shall maintain a Corrective Action Monitoring Log of MDOT reportable and non-reportable hazards or deficiencies, and provide MDOT with quarterly corrective action implementation updates. These updates will be provided at the quarterly Rail Safety Oversight meetings and should be reflected in the Logs. MTA shall verify to MDOT in written form when the corrective actions plans for MDOT reportable hazards or deficiencies have been fully implemented. The MTA Safety or Security function must verify in written form that the corrective action has been verified as being fully implemented and any evidence, or method of the verification shall be provided to MDOT. The MTA corrective action is then subject to independent MDOT verification.

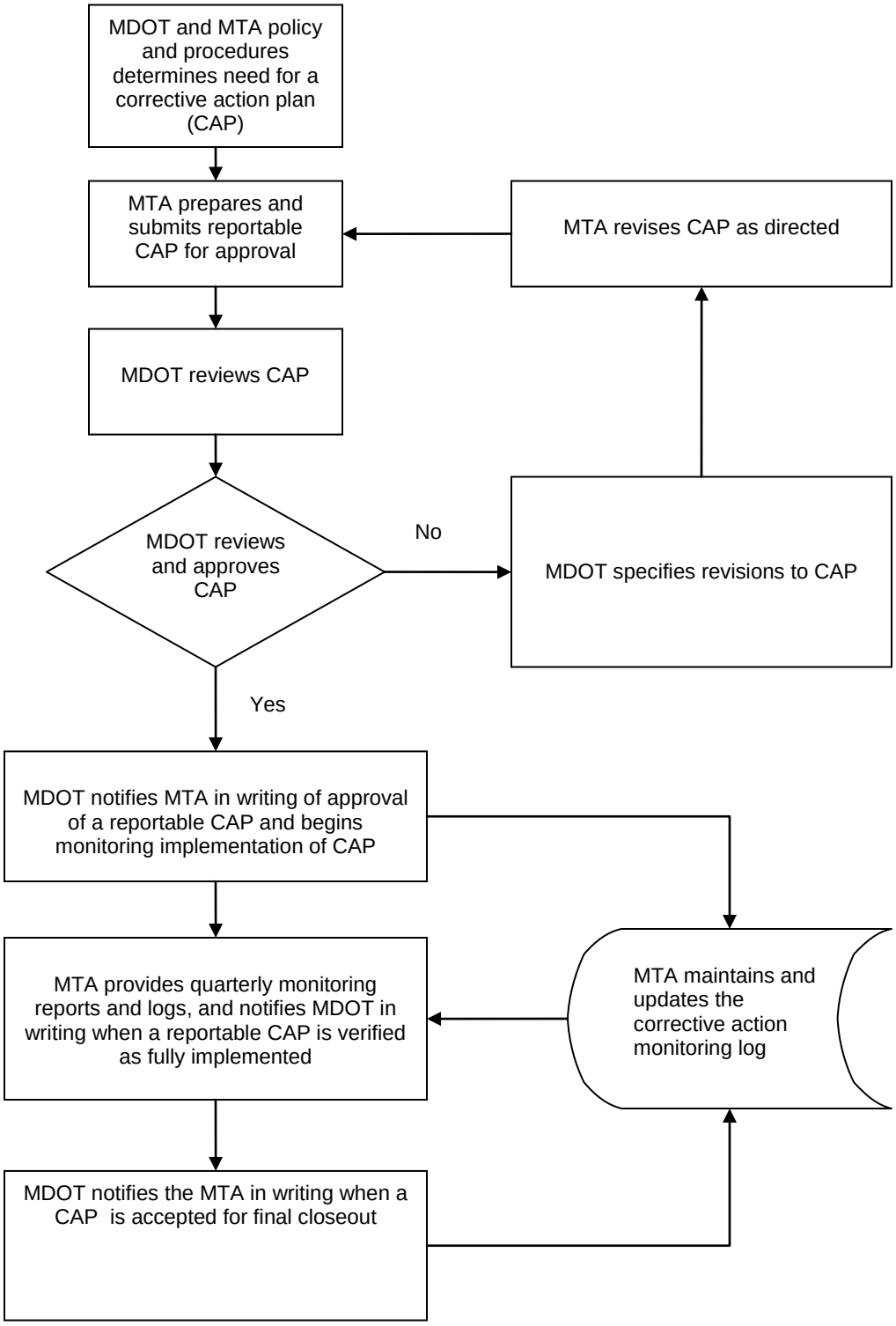
Due to the sensitive nature of security related information and the requirements to protect Security Sensitive Information, MDOT may receive regular briefings and/or reports on the status of system security and the implementation of corrective actions from the MTA Police at their regular Comparison Statistics Meetings (Compstat). MDOT may attend Compstat meetings on an as-needed basis, contingent upon the existence of security-sensitive corrective action plans, though generally at least one such meeting each quarter.

Each MDOT reportable corrective action plan log shall:

- include a MTA tracking identification number assigned to the hazard or deficiency
- include priority number based on the MTA SSPP Hazard Risk Assessment or MTA SEPP Threat and Vulnerability Identification Process
- include the dates the corrective action plan was submitted to MDOT, approved by MDOT, verified by the MTA and final close out by MDOT
- include the current status of all corrective action plans

Figure 9 identifies the corrective action plan process.

Figure 9: Corrective Action Plan Process



9 Reporting to FTA

9.1 Objective

This section addresses MDOT's procedures for making initial, annual and periodic submissions to FTA's Office of Safety and Security, in compliance with 49 CFR Part 659.39 and Part 659.43.

9.2 Reporting Requirements to FTA

Initial submission. The following information, contained in MDOT's initial submission to the FTA, must be updated as necessary:

- The name and address of the MDOT State Safety Oversight Director;
- The names and addresses of the transit agencies subject to TDO jurisdiction under 49 CFR Part 659;
- MDOT's program standard; and
- MDOT's certification that the SSPP and the SEPP have been developed, reviewed, and approved.

In the event that the state should ever determine that oversight authority should be transferred to another agency of the state, MDOT will work with this agency to ensure that a new Initial Submission is delivered to FTA within thirty (30) calendar days of the determination to make change. MDOT will also work with this agency to ensure that at no point are the RTAs affected by 49 CFR Part 659 (i.e., MTA) left without a duly authorized oversight agency.

Annual submission. Before March 15 of each year, MDOT must submit the following to FTA:

- A publicly available annual report summarizing its oversight activities for the preceding twelve months, including a description of the causal factors of investigated accidents, status of corrective actions, updates and modifications to rail transit agency program documentation, and the level of effort used by the oversight agency to carry out its oversight activities.

- A report documenting and tracking findings from triennial safety review activities and whether a triennial safety review has been completed since the last annual report was submitted.

- Program standard and supporting procedures that have changed during the preceding year.

- Certification that any changes or modifications to the rail transit agency system safety program plan or SEPP have been reviewed and approved by the oversight agency.

Annual Certification. With its Annual Submission, MDOT must certify to the FTA that it has complied with the requirements of 49 CFR Part 659. MDOT will submit this certification electronically to FTA using a reporting system specified by FTA. MDOT will maintain a signed copy of each annual certification to FTA, subject to audit by FTA.

Periodic submissions. Status reports of accidents/incidents, hazardous conditions, and corrective action plans or other program information must be forwarded to the FTA upon

request. Following an FTA SSO audit, MDOT may be required to respond to specific findings of non-compliance or areas of compliance with recommendations. MTA may also be required to respond to FTA recommendations resulting from an SSO audit.

MDOT will ensure that all submissions to FTA are submitted electronically using the reporting system specified by FTA.

10 Other MDOT Reviews

MDOT may conduct reviews and special studies of issues related to the safety of the MTA Light Rail and Metro at its discretion. In addition to the review areas listed below (Safety and Security Certification Programs, System Expansions and Modifications, SSPP Readiness Reviews for New Starts projects, and Pre-Revenue Service Reviews for major capital projects), MDOT may initiate a review of a particular subject matter area in response to a given accident, incident (including near-misses), or hazardous condition, or trend pattern in a safety-related area. Such reviews and studies may result in a final report containing findings and recommendations that shall be subject to the CAP process described in Section 8.

10.1 Reviews of Safety and Security Certification Program

MTA is required to have a Safety and Security Certification (SSC) program to help ensure that safety and security concerns, and hazards, threats and vulnerabilities are adequately addressed prior to the initiation of passenger operations for New Starts and subsequent major projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment. MDOT shall provide general review and oversight of the SSC process. MTA shall submit SSC plans and documents to MDOT for review and comment on all projects subject to the SSC process. MDOT shall participate in SSC-related meetings and document reviews, and may issue specific findings, guidance, and/or other directives to MTA in order to address safety and security issues related to certifiable elements and certifiable elements and certifiable items and potential workarounds.

10.2 Reviews of System Expansions and System Modifications

In order to assess safety and security of new processes within MTA, MDOT may review major system modifications and expansions, and other projects that have a significant safety or security impact. The following list includes types and examples of MTA expansions or modifications that MTA shall submit for MDOT review:

- New starts or system expansions
- Major reconstruction of existing lines
- Major redesign and installation of system components
- New or significantly reconstructed maintenance and operating facilities
- New vehicle procurements or mid-life overhauls
- Other projects deemed to have significant safety implications, including projects implemented by others that have a direct impact on MTA operations

The review and oversight by MDOT will depend significantly on the type of system expansion or modification under review. MDOT may review and all development phases or applicable projects including:

- Project planning
- Preliminary engineering
- Final design
- Procurement
- Construction
- Operations and maintenance procedures and plans

- Training
- Testing
- Start-up

The MDOT review may include each of these phases, so that any safety- and security-critical issues can be resolved as early as possible, to avoid or minimize the need for retroactive modification and retrofits. This approach should allow MTA to resolve safety and security issues in a timely manner, so as not to delay the project implementation schedule.

In reviewing each phase of a major system expansion or modification, MDOT will focus its resources on providing an independent review of safety- and security-critical system elements and activities, in addition to the more general aspects of a project that could affect the safety and security of existing operations. The materials MDOT will review throughout the project may include the following:

- Planning studies (that evaluate alternatives and define a project's scope)
- Design criteria and standards
- Design documents
- SSC plans
- Project Management Plans (PMPs – required on major FTA-funded projects)
- Configuration Management plans
- Construction plan and schedules
- Operating changes and plans during project construction
- Transportation & maintenance operating procedures
- Training programs and procedures
- Integrated test program
- Emergency procedures
- System safety and security reviews
- Security plans

After the review of a particular project phase has been completed, MDOT will provide an immediate oral briefing to MTA and issue a draft report detailing its findings and recommendations within 60 calendar days of the end of the review. Any MTA comments shall be provided within 30 calendar days and the MDOT final report will be issued within 30 days of receipt of MTA comments.

MDOT may continue to review each phase of the project until project completion. At project completion, the system expansion and modification will be incorporated into the triennial review of the operating and maintenance activities at MTA.

10.3 Pre-Revenue Service Review/ Readiness Review

MDOT shall conduct an on-site Pre-Revenue Service Review (PRSR) of major projects to expand or modify the existing rail system. This review will be conducted after substantial completion of the project, but prior to entry into passenger operations. The PRSR will focus on the SSC process as well as operations, training, maintenance, and security/emergency readiness in order to ensure safe and secure passenger service.

This review is designed to assess the safety and security of the project and the readiness of MTA's associated safety, security, operational, and maintenance procedures and preparations. The completion of a SSC process is required by Part 659 and noted in this Program Standard. SSC is intended to ensure that elements and items that are critical to the safe and secure operation of the project at each phase (from design to revenue operations) identified as part of a safety certifiable items list (SCIL) have been verified as completed and/or safe and secure, or that there are appropriate workarounds in place. These SCIL elements and items include physical systems and facilities that comprise the project, as well as documents, plans, and training/certification programs.

MDOT will use the PRSR to ensure that MTA uses appropriate processes to complete SSC. MDOT will also review the mitigation of hazards and vulnerabilities, and assess general operational and maintenance readiness. Before revenue service begins, MTA shall submit a Safety and Security Certification Verification Report to MDOT for review and approval. The report shall document the completion of the SSC process. MDOT will forward its approval of this report to FTA prior to the start of revenue operations.

The result of the review will be a written report with findings and recommendations. MTA may already be aware of and addressing many, if not most, of the findings and unfinished items that MDOT may identify during the review process. MDOT may issue findings regarding incomplete certifiable items, or may require a workaround prior to the start of revenue service. MDOT may also identify findings regarding other safety or security-related issues that require corrective action, either prior to revenue service, or as a longer-term corrective action. MDOT will identify findings via the following means:

- Ongoing feedback during the on-site review process, including discussions and meetings with appropriate managers
- A verbal summary of identified findings during a brief close-out briefing at the conclusion of the on-site assessment, with a special focus on any near-term issues that may need to be resolved prior to revenue operations
- An interim report issued to MTA within 2 weeks of the conclusion of the on-site review.

- MDOT will work with MTA to verify progress in addressing findings and unfinished items, and will issue a final report that documents these actions prior to the start of revenue operations.

For New Starts projects requiring the development of a new SSPP and SEPP, the PRSR process shall also include an SSPP and SEPP Readiness Review. The review would take place after the initial submission of the SSPP and SEPP, but prior to revenue operations. In addition to the PRSR components described above, this assessment would focus on the capabilities of the RTA to implement its SSPP and SEPP during passenger operations. This assessment may be conducted in conjunction with MDOT review and approval of the initial SSPP and SEPP submissions.

Appendix A – Checklist for Reviewing the SSPP

Rail Transit Agency (RTA) _____

State Oversight Agency Reviewer _____ Date _____

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
1.	Policy Statement	• A policy statement is developed for the System Safety Program Plan (SSPP). • The policy statement describes the authority that establishes the system safety program plan. • The policy statement is signed and endorsed by the rail transit agency's chief executive.			
2.	Purpose, Goals and Objectives	• The purpose of the SSPP is defined. • Goals are identified to ensure that the SSPP fulfills its purpose. • Objectives are identified to monitor and assess the achievement of goals. • Stated management responsibilities are identified for the safety program to ensure that the goals and objectives are achieved.			
3.	Management Structure	• An overview of the management structure of the rail transit agency is provided including an organization chart. • Organizational structure is clearly defined and includes: o History and scope of service, o Physical characteristics, and o Operations and Maintenance. • A description of how the safety function is integrated into the rest of the rail transit organization is provided. • Clear identification of the lines of authority used by the rail transit agency to manage safety issues is provided.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
4.	Plan Review and Modification	• An annual assessment of whether the system safety program plan should be updated is specified. • The process used to control changes to the system safety program plan is described. • Specific departments and persons responsible for initiating, developing, approving, and issuing changes to the SSPP are identified. • Required coordination with the oversight agency regarding plan modification, including timeframes for submission, revision, and approval, is addressed.			
5.	Plan Implementation	• A description of the specific activities required to implement the system safety program plan is included. • Tasks to be performed by the rail transit safety function, by position and management accountability, are identified and described. • A description of the methodologies used by the system safety function to achieve their safety responsibilities should be provided. • Safety-related tasks to be performed by other rail transit departments, by position and management accountability, are identified and described. • A task matrix (or an equivalent narrative description) showing: all identified safety responsibilities, interfaces among all rail transit units responsible for each task, and the key reports or actions required, should be provided.			
6.	Hazard Management Process	• The process used by the rail transit agency to implement its hazard management program, including the role of the oversight agency in providing ongoing communication, is described. • The hazard management process includes activities for: hazard identification, hazard investigation, evaluation, and analysis, hazard control and elimination, hazard tracking. • Requirements for ongoing reporting to the oversight agency relating to hazard management activities and status are specified.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
7.	Safety Certification Process	• A description of the safety certification process required by the rail transit agency to ensure that safety concerns and hazards are adequately addressed prior to the initiation of passenger operations for New Starts and subsequent major projects to extend, rehabilitate, or modify an existing system, or to replace vehicles and equipment.			
8.	System Modifications	• The process used by the rail transit agency to ensure that safety concerns are addressed in modifications to existing systems, vehicles, and equipment, which do not require formal safety certification, but which may have safety impacts, is described.			
9.	Safety Data Acquisition	• The process used to collect, maintain, analyze, and distribute safety data is clearly defined. • The management process for ensuring that the safety function within the rail transit organization receives the necessary information to support implementation of the system safety program is clarified.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
10.	Incident Notification, Investigation, and Reporting	• A description is provided regarding the process used by the rail transit agency to perform accident notification, investigation and reporting. • Criteria for determining what accidents/incidents require investigation, and who is responsible to conduct specific investigations are developed. • A description of the procedures for performing investigations, including proper documentation and reporting of findings, conclusions reached, use of hazard resolution process to develop corrective action recommendations, and follow-up to verify corrective action implementation is provided. • Notification thresholds for internal departments/functions are defined. • Criteria are specified for notifying external agencies (NTSB, state oversight agency) of accidents and incidents. • Procedures are established for documenting and reporting on accident investigations. • Process used to develop, implement, and track corrective actions that address investigation findings is specified. • Coordination with the oversight agency is specified.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
11.	Emergency Management Program	• The agency's emergency planning responsibilities and requirements are identified. • A description of the process used by the rail transit agency to develop an approved, coordinated schedule for emergency management program activities is provided. • Required meetings with external agencies regarding the emergency management program are specified. • The process used to evaluate emergency preparedness, such as annual emergency field exercises, is documented. • After action reports and implementation of findings are required. • The process is explained to be used by the rail transit agency for the revision and distribution of emergency response procedures. • The agency's responsibilities for providing employee training are identified. • The agency's responsibilities for providing familiarization training to local public safety organizations are identified.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
12.	Internal Safety Review Program	• A description of the process used by the rail transit agency to ensure that planned and scheduled internal safety reviews are performed to evaluate compliance with the SSPP is included. • Identification of departments and functions subject to review is performed. • Auditors must be independent from the first line of supervision responsible for the activity being audited. • A triennial review schedule must be developed, reviewed, maintained and updated to ensure that all 21 SSPP elements are reviewed during the review cycle. • The process for conducting audits, including the development of checklists, and procedures for conducting audits and issuing of findings is described. • The SSPP must describe the requirement of an annual review report that summarizes the results of individual reviews performed during the previous year and includes the status of required corrective action items. This report must be submitted to the state oversight agency for review and approval. • The process for resolving problems and disagreements, report distribution, and follow-up on corrective action procedures is described. • The ISAP process and reporting must be coordinated with the state oversight agency. • The ISAP process should be comprehensive.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
13.	Rules Compliance	• Operating and maintenance rules and procedures that affect safety are identified. • Operating and maintenance rules and procedures that affect safety are reviewed for their effectiveness and determinations are made regarding their need to be updated. • Description of process for developing, maintaining, and ensuring compliance with operating and maintenance rules and procedures. • Techniques used to assess the implementation of operating and maintenance rules and procedures by employees, such as performance testing/compliance checks. • Techniques used to assess the effectiveness of supervision relating to the implementation of operating and maintenance rules. • Process for documenting results and incorporating them into the hazard management program.			
14.	Facilities and Equipment Inspections	• Identification of the facilities and equipment that are subject to regular safety related-inspection and testing is provided. • A description of how safety-related equipment and facilities are included in a regular inspection and testing program is provided. • Use of a written checklist for conducting facility inspections. • Descriptions of how identified hazardous conditions are entered into the Hazard Resolution Process.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
15.	Maintenance Review and Inspection Program	• A list of systems and facilities subject to a maintenance program, along with established maintenance cycle and required documentation of maintenance performed for each item, is provided. • A description of the process for tracking and resolving problems identified during inspections is provided. • Use of a written checklist for conducting maintenance reviews is required.			
16.	Training and Certification Program	• A description of the training and certification program for employees and contractors is provided. • Categories of safety-related work requiring training and certification are identified. • Description of the training and certification program for employees and contractors in safety-related positions is provided. • Description of the training and certification program for contractors is provided. • The process used to maintain and access employee and contractor training records is described. • The process used to assess compliance with training and certification requirements is described.			
17.	Configuration Management Process	• A description of the configuration management control process is provided and appropriate references are made to other rail transit agency documents governing this process. • Process for making changes is described. • Authority to make configuration changes is described and assurances are provided for formal notification of all involved departments.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
18.	Compliance with Local, State and Federal Safety Requirements	• A description of the safety program for employees and contractors that incorporates the applicable local, state, and federal requirements is provided. • Safety requirements that employees and contractors must follow when working on, or in close proximity to, rail transit agency controlled property are identified. • Processes for ensuring the employees and contractors know and follow the requirements are described.			
19.	Hazardous Materials Program	• A description of the hazardous materials program, including the process used to ensure knowledge of and compliance with program requirements is provided.			
20.	Drug and Alcohol Program	• A description of the drug and alcohol program and the process used to ensure knowledge of and compliance with program requirements is provided.			
21.	Procurement	• A description of the measures, controls, and assurances in place to ensure that safety principles, requirements, and representatives are included in the rail transit agency procurement process.			

Appendix B – Checklist for Reviewing the SEPP

Rail Transit Agency (RTA) _____

State Oversight Agency Reviewer _____ Date _____

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
1.	Policy Statement	• A policy statement should be developed for the System Security and Emergency Preparedness Plan. • The policy statement should describe the authority that establishes the SEPP, including statutory requirements and the rail transit agency's relationship with the oversight agency. • The policy statement is signed and endorsed by the rail transit agency's chief executive.			
1.1	Purpose	• The SEPP should identify the purpose of the security program endorsed by the agency's chief executive. • The SEPP should introduce the concept of "system security." • The SEPP introduce the concept of "emergency preparedness."			
1.2	Goals and Objectives	• The SEPP should identify the goals of the SEPP program endorsed by the agency's chief executive. • The SEPP should identify the objectives of the SEPP program endorsed by the agency's chief executive.			
1.3.	Scope	• Describe the scope of the SEPP and Program.			
1.4	Security and Law Enforcement	• Describe the security and law enforcement functions that manage and support implementation of the SEPP.			
1.6	Government Involvement	• Describe how the SEPP interfaces with local, state and federal authorities to ensure security and emergency preparedness for the system.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
1.7	Security Acronyms and Definitions	• Provide a listing of acronyms and definitions used in the SEPP.			
2.1	Background and History	▪ A description of the agency including general overview, a brief history and scope of rail transit services provided.			
2.2	Organizational Structure	• Organizational charts showing the lines of authority and responsibility as they relate to security and emergency preparedness.			
2.3	Human Resources	• Provide a categorization and break-down of all employees and contractors who work for/on the rail transit agency.			
2.4	Passengers	• Provide a description of the rail transit agency's ridership.			
2.5	Services and Operations	• Describe the rail transit agency's operations and services.			
2.6	Operating Environment	• Describe the rail transit agency's operating environment.			
2.7	Integration with Other Plans	• Describe how the SEPP integrates with other plans and programs maintained by the rail transit agency.			
2.8	Current Security Conditions	• Description of the current security conditions at the rail transit agency and the types of security incidents experienced by the transit system and their frequency of occurrence.			
2.9	Capabilities and Practices	• Summary description of methods and procedures, devices, and systems utilized to prevent or minimize security breaches, including passenger education, campaigns, delay, detection, and assessment devices, and others that may be applicable.			
3.1	Responsibility for Mission Statement	• Identification of the person(s) responsible for establishing transit system security and emergency preparedness policy and for developing and approving the SEPP.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
3.2	Management of the SEPP Program	• Identification of the person(s) with overall responsibility for transit security and emergency preparedness, including day-to-day operations, SEPP-related internal communications, liaison with external organizations, and identifying and resolving SEPP-related concerns.			
3.3	Division of Security Responsibility	• Listing of SEPP-related responsibilities of the personnel who work within the transit agency security/police function. • Listing of SEPP-related responsibilities of other departments/functions, including their relationship to the security/police function. • Listing of security-related responsibilities for other (non-security/police) rail transit agency employees, including their relationship to the employee's other duties. • A SEPP Program Roles and Responsibilities Matrix should be developed showing interfaces with other transit system departments/functions and the key reports or actions required. • The responsibilities of external agencies for supporting SEPP development and implementation should be identified. • The committees developed by the rail transit agency to address security issues should be identified.			
4.1	Planning	• Identification of SEPP activities and programs in place at the rail transit agency to support planning for system security and emergency preparedness.			
4.2	Organization	• Identification of the organization of SEPP-related activities and programs and the ability to coordinate with external response agencies.			
4.3	Equipment	• Description of the equipment used to support implementation of the SEPP program.			
4.4	Training and Procedures	• Description of SEPP-related training and procedures available to ensure employee proficiency.			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
4.5	Exercises and Evaluation	• Description of SEPP-related activities to ensure the conduct of emergency exercises and evaluation.			
5.1	Threat and Vulnerability Identification	• Description of the rail transit agency's activities to identify security and terrorism-related threats and vulnerabilities.			
5.2	Threat and Vulnerability Assessment	• Description of the rail transit agency's activities to assess the likely impacts of identified threats and vulnerabilities on the system and to identify particular vulnerabilities which require resolution.			
5.3	Threat and Vulnerability Resolution	• Description of how response strategies (both short- or long-term strategies) are developed for prioritized vulnerabilities, including the decision process used to determine whether to eliminate, mitigate, or accept security problems.			
6.1	Required Tasks for Goals and Objectives	• Identification of tasks to be performed to implement the goals and supporting objectives required to implement the SEPP.			
6.2	Task Schedule	• General schedule with specific milestones for implementation of the security program, threat and vulnerability analyses, staff security training, and regular program reviews during the implementation process.			
6.3	Evaluation	• Description of the types of internal management reviews to be conducted, the frequencies of the reviews, and the person(s) responsible.			
7.1	Initiation of SEPP Revisions	• Description of process used to initiate revisions to the security plan, gather input for the revisions, procedures for updating the security plan, and identification of responsible person(s).			
7.2	Review Process	• Description of the process used to review and revise the security plan as necessary, including frequency of reviews, and responsible person(s).			

#	CHECKLIST ITEM	PLAN REQUIREMENTS Does the PLAN contain or provide for the following:	INCLUDED Yes — No	PAGE REF.	COMMENTS
7.3	Implement Modifications	• Description of process used to communicate and disseminate new and revised procedures and other elements of the security plan to appropriate transit agency staff.			

Appendix C – MTA Accident/Incident Investigation Procedures (AIIP)

MDOT and the MTA will use the current MTA AIIP that has been formally approved by MDOT and the MTA to conduct all MTA Metro and Light Rail related accident/incident investigations.

Appendix D –MDOT Annual Approval of MTA Internal Safety and Security Review Report Checklist

SSO APPROVAL CHECKLIST ELEMENTS		
Safety	**Security**	**Internal Safety and Security Review Element**
☐	☐	1. Prior to January 31st, MTA submitted its internal safety and security report accompanied by a formal letter of certification signed by the MTA Administrator indicating that the MTA is in compliance with its SSPP and SEPP.
☐	☐	2. Indicate that the required elements scheduled for review during the past year were reviewed.
☐	☐	3. Verify that MTA has submitted an updated schedule for the upcoming internal safety and security reviews and that MTA is on schedule to review the 21-safety and 7-security elements within a 3-year period.
☐	☐	4. Verify that MDOT was provided 30-days notification and relevant checklists and/or procedures were submitted prior to the conduct of any internal safety and security reviews.
☐	☐	5. Verify that the person(s) conducting the review were independent from the department being reviewed.
☐	☐	6. The review finding evaluated the adequacy and effectiveness of the SSPP and SEPP.
☐	☐	7. The completed review checklists show the activity reviewed, the method of verification, review findings, and recommendations with appropriate corrective action(s).
☐	☐	8. Corrective action plans contain the required elements, including action to be taken by MTA, implementation schedule and the individual or department responsible for the implementation.

Annual Report Year: Click here to enter text.

Checklist Completion Date: Click here to enter text.

Completed By: Click here to enter text.